### ATTENTION

The following documents appearing in FBI files have been reviewed under the provisions of The Freedom of

| □ FOIA/PA  | ☐ Litigation                                  | ☐ Executive Order Applied   |
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| Requester:   |   |   |
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| Jassincation review. Ple   | ase see the documents located in the FDPS for | Processing System (FDPS) prior to National Sector current classification action, if warranted. Di |
| nquires about the FDPS t File Number: Serial(s) Reviewed: FOIPA Requester: FOIPA Subject:  | Timothy J. Burger                             | b7C SectionSection  |
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THIS FORM IS TO BE MAINTAINED AS THE TOP SERIAL OF THE FILE, BUT NOT SERIALIZED.

ATTENTION

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| r   |   | Date 9/11/80  |                |
| TO: DIRE  | CTOR, FBI (58-10334                       | 4)  |                |
| FROM: SAC,  | CHARLOTTE (183-415                        | 5) (RUC)  |                |
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| (2-Bureau (Enc.<br>2-WFO (183-514)<br>1-Charlotte (18<br>TJB/jmg<br>(5) | 2)<br>(SQ C-3)<br>33-415)                 |   |                |
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DIRECTOR

FROM:

SAC BALTIMORE (183-655) (Sq. 7) (P)

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Rico

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Re WFO airtel to Baltimore, 8/6/80 and Baltimore teletype to WFO, 8/26/80.

Enclosed for FBIHQ are two copies of an FD-302 reflecting receipt of Rule 420.206 from the code of Federal Regulations.

Enclosed for WFO are the original and 2 copies of an FD-302 reflecting the same.

LEAD: Baltimore

AT DOVER, DELAWARE

Investigation continuing.

2 WFO (183-574 Encs. 2)
2 Bureau (50-10334 encs.2)
2 Baltimore
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#### FEDERAL BUREAU OF INVESTIGATION

1

Date of transcription 9/9/80

of Long Care, Health Care Financing Administration, 1849
Gwynn Brook Avenue, Baltimore, Maryland, furnished one
copy of Rule 420.206 from the code of Federal Regulations,
which is attached hereto.

b7C

State of the state

| Investigation on 9/5/80 | at Baltimore, Maryland | File # 183-655 |  |
|-------------------------|------------------------|----------------|--|
|                         |                        |                |  |
| bySA                    | pån Date dict          | ated 9/8/80    |  |

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

preceding year, served as a Medicare fiscal intermediary or carrier for the provider. "Similar capacity" means the performance of essentially the same work functions as those of a manager, accountant, or auditor even though the individual is not so designated by title.

## § 120,201 Principals convicted of a program related crime.

(a) Information required. Prior to the Secretary's acceptance of a provider agreement, or at any time upon writter, request by the Secretary, the provider must furnish the Secretary with the identity of any person who has an ownership or controlling interest in the provider, or who is an agent or managing employee of the provider, and has been convicted of a criminal offense relating to involvement in Medicare, Medicaid, or the title XX services program since the inception of those programs.

(b) Refusal to enter into or renew agreement. The Secretary may refuse to enter into or renew an agreement with a provider of services if any person who has an ownership or controlling interest in the provider, or who is an agent or managing employee, has been convicted of a criminal offense related to the involvement of that person in Medicare, Medicaid, or the title XX services program. In making this decision, the Secretary will consider the facts and circumstances of the specific case, including the nature and severity of the crime and the extent to which it adversely affected beneficiaries and the programs involved. The Secretary will also consider whether he has been given reasonable assurance that the person will not commit any further criminal offense against the programs.

(c) Notification of Inspector General. The Secretary will promptly notify the Inspector General of the Department of receipt of any application or request for participation, certification, or recertification that identifies any person described in paragraph (a) of this section and of the action taken on that application or request.

§ 120,205 Disclosure by providers of base ness transaction information.

A provider must submit to the Secretary, within 35 days after the date of a written request, full and complete information on:

(a) The ownership of a subcontractor with whom the provider has had during the previous 12 months, business transactions in an aggregate amount in excess of \$25,000; and

(b) Any significant business transactions between the provider and any wholly owned supplier or between the provider and any subcontractor, during the 5 year period ending on the date of the request.

# § 420,206 Disclosure of persons having ownership, financial, or control interest.

(a) Information that must be disclosed. A disclosing entity must submit the following information in the manner specified in paragraph (b) of this section.

(1) The name and address of each person with an ownership or control interest in the entity or in any subcontractor in which the entity has a direct or indirect ownership interest totalling 5 percent or more:

(2) Whether any of the persons named, in compliance with paragraph (a)(1) of this section, is related to another as spouse, parent, child, or sibling; and

(3) The name of any other disclosing entity in which any person with an ownership or control interest in the disclosing entity also has an ownership or control interest. This requirement applies to the extent the entity can obtain the information by requesting it in writing from the person. The disclosing entity must:

(i) Keep copies of all these requests and the responses to them:

(ii) Make them available to the Scretary or the Medicaid agency upon request; and

(iii) Advise the Secretary when there is no response to a request.

(b) Time and manner of disclosure. (1) Any disclosing entity that is subject to periodic survey and certification of its compliance with Medicare standards must supply the information specified in paragraph (a) of this

section to the State survey agency at the time it is surveyed. The survey gency will promptly furnish the information to the Secretary.

(2) Any disclosing entity that is not subject to periodic survey and certification must supply the information specified in paragraph (a) of this section to the Secretary before entering into a contract or agreement to participate in Medicare.

(3) Updated information must be furnished to the Secretary at intervals between recertifications or contract renewals, within 35 days of a written request.

(c) Consequences of failure to disclose. (1) The Secretary will not ap-

prove an agreement or contract with, or make a determination of eligibility, for, any disclosing entity that fails to comply with paragraph (b) of this section.

(2) The Secretary will terminate any existing agreement or contract with or withdraw a determination of eligibility for, any disclosing entity that fails to comply with paragraph (b) of this section.

(d) Public disclosure. Information furnished to the Secretary under the provisions of this section shall be subject to public disclosure as specified in 20 CFR Part 422.

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| TO DIRECTOR FBI (183-3052) PRIORITY       | Telephone F.a. Director's Sec'y           |
| FBI BOSTON (183-614) PRIORITY             | 1/1/1/1                                   |
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| RE WASHINGTON FIELD TELETY PE TO DIR      | ECTOR, DATED JULY 29,                     |
| 1980. BUREAU AIRTEL TO WASHINGTON FIELD   | , DATED AUGUST 8, 1980.                   |
| FOR INFORMATION OF BOSTON AND NEW H       | aven divisions, b7C                       |
| DEPARTMENT OF JUSTICE AUTHORITY GRANTED   |   |
| FOR BODY RECORDER DEVICE REFERRED TO IN   | CAPTIONED COMMUNICATION                   |
| DATED JULY 29, 1980.                      | 58-10334-15                               |
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| AS TO HIS TRAVEL PLANS TO THE BOSTON AREA.       |                |      |
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FM DIRECTOR FBI (183-3052)
TO FBI WASHINGTON FIELD (183-514) (C-3) IMMEDIATE

ATTENTION: ASAC THOMAS BAKER

16) BT b7C UNCLAS ET AL; RICO (D); OO: REBUTELCAL TO WFO {SUPERVISOR OBPL FEL TZUBUA INVESTIGATION TO DATE PURPORT ALLEGATIONS OF CRIMINAL INVOLVEMENT CONCERNING ONE OF THE NATION'S MOST PROMINENT PUBLIC B LEADERS, SPEAKER OF THE HOUSE THOMAS O'NEILL. INVESTIGATION SHOULD AT ALL TIMES BE THOROUGH AND COMPRE-INVESTIGATION OF PUBLIC OFFICIALS SHOULD ALSO BE 6 HENSIVE . CONDUCTED EXPEDITIOUSLY. THIS HAS NOT OCCURRED IN THIS A INSTANCE. WFO, UNTIL FURTHER NOTICE, IS TO PROVIDE FBIHQ AN INVESTI-2) GATIVE REPORT SUITABLE FOR DISSEMINATION ON A 30-DAY PERIOD REPORTING THE RESULTS OF ALL PERTINENT INVESTIGATIVE ACTIVITY. APPROVED BY DRAFTED BY ROOM PFN:TES 22: 8/15/80 5131/6

Joseph Land

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2 AUG 19 1980

DO NOT FILE WITHOUT COMMUNICATIONS STAMP

### department of Justice rederal Bureau of Investigation

COMMUNICATION MUSSAGE FORM

|    | PAGE 2           | Continuation sheet                             |    |
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|    | THE FIRST SUBMI  | ISSION IS TO BE AT FBIHQ BY SEPTEMBER 1, 1980. |    |
| 20 | INCLUDED IN THE  | E FIRST REPORT SHOULD BE AN OUTLINE OF THE     |    |
| 18 | _INVESTIGATIVE F | PLAN.  |    |
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| TO         | DIRECTOR, FBI (5  | 6-103343 EMM | EDIATE                                |  |
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AUGUST 15, 1980.

ALL OFFICES, PER BUREAU INSTRUCTION, TWO COPIES OF ALL COMMUNICATION REGARDING CAPTIONED MATTER BETWEEN DIVISIONS. SHOULD BE DESIGNATED FOR FEDERAL BUREAU OF INVESTIGATION HEADQUARTERS.

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| TO: DIRECTOR,  | , FBI (58-10334)   |  |                            |  |
| FROM: ASAC, ADM  | 4. DIV., WFO (183-   | ·514) (P) (SQUAD C- <b>5</b> )   |                            |  |
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| All office copies of all commu                         |  | to furnish FBIHQ with  |                            |  |
| coordinate this inv                                    | Washington, D. C. vestigation. expense handled expense a E | ices, Departmental At (WDC), has been assigned requests that additiously as he is prederal Grand Jury in | ned to<br>t all<br>esently |  |
| 2 - Bureau<br>2 - Baltimore<br>2 - Boston<br>2 - Miami |  | 58 - 1035  |                            |  |
| 2 - New Orleans 2 - New York 2 - Richmond 1 - WFO      | <b>.</b>   | SEP 25 19  |                            |  |
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| Approved: MER  | Transmitted  | Number) (Time)   |                            |  |

#### **LEADS**

#### BALTIMORE DIVISION

AT DOVER, DELAWARE. Will through appropriate officials, Department of Corporation, Dover, Delaware, determine if any certificates of assumed or fictitious names under the assumed name statue, Title 14, Section 230, were filed for the following corporations:

- Glenside, Inc. Washington, D. C.
- 2. Quali Care of Massachusetts New Orleans, Louisiana
- 3. Health Services, Inc. New Orleans, Louisiana
- 4. DeBlois, Inc.
  New Orleans, Louisiana
- 5. Humana, Inc. Louisville, Kentucky

#### BOSTON DIVISION

AT BOSTON, MASSACHUSETTS. Will through appropriate officials at the Department of Corporation, Boston, Massachusetts, obtain copies of all records relating to Glenside, Inc., Jamaica Plain, Massachusetts, from 1958 through Present. Will obtain business tax license records, amendments, etc. for Glenside, Inc.

Will conduct appropriate indices credit checks on the following individuals:

| ι. |  |  |
|----|--|--|
| 2. |  |  |
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Will through records of the Malden District Court,
Malden, Massachusetts, obtain background information on

Will attempt to obtain present employment, past employments, associates, etc.

b7C

Will through appropriate officials, Department of Corporations, Boston, Massachusetts, determine if Glenside, Inc., Jamaica Plain, Massachusetts, has filed any certificate of assumed or fictitious names under the assumed name statue, Title 14, Section 230.

Will, if appropriate, through contacts with appropriate Suffolk County Judge. Suffolk County. Massachusetts. handling

and ascertain the feasibility of reviewing the court file regarding that proceeding.

Will as indicated in WFO airtel to Alexandria dated 8/1/80, leads one (1) and two (2), through appropriate officials at the Recorder of Deeds, Suffolk County, Boston, Massachusetts, obtain copies of the deeds of the property by document number 292029 dated 11/14/72 and 302728 dated 11/14/72 prior to being purchased by Medleg Associates.

Will determine who owned the two above parcels of property as modified by document number 239622 dated 11/14/72 purchased by Medleg Associates and what was the purchase price.

Will through appropriate records at the Land Registration Office, Suffolk County, Boston, Massachusetts, obtain copies of document 208115 relating to NEIL ZAIS, trustee of Paper Realty Trust dated 10/4/68; document number 271147 relating to MORRIS REEF and RAYMOND REEF, trustees of Paper Realty Trust, dated 6/24/68; and NEIL ZAIS and MORRIS F. REEF, trustees of Buswell Realty Trust dated 3/1/65.

#### MIAMI DIVISION

AT PALM BEACH, FLORIDA. Will through appropriate officials at the Recorder of Deeds, Palm Beach, Florida, determine the listed owners of Banyon Kennels, Palm Beach, Florida.

Will conduct appropriate indices checks on the following individuals.

b7C

2.
 3.

#### NEW ORLEANS DIVISION

AT NEW ORLEANS, LOUISIANA. Will contact the Metropolitan Crime Commission, New Orleans, Louisiana, telephone number (504) 524-3148, and obtain any and all information they may possess regarding the following companies as they relate to penetration by the crime syndicate in New Orleans, Louisiana:

- Quali Care, Inc. New Orleans, Louisiana
- 2. Quali Care of Louisiana New Orleans, Louisiana
- 3. Health Services, Inc. New Orleans, Louisiana
- DeBlois, Inc. New Orleans, Louisiana
- 5. Humana, Inc. Louisville, Kentucky
- 6. Glenside, Inc. Boston, Massachusetts
- 7. Human Services Inc. New Orleans, Louisiana

- 8. American Medicorp Louisville, Kentucky
- 9. American Health Services, Inc. New Orleans, Louisiana

AT BATON ROUGE, LOUISIANA. Will through appropriate officials at the Department of Corporations, Baton Rouge, Louisiana, determine if any of the above named companies filed b7C any certificate of assumed or fictitious names under assumed name statues, Title 14, Section 230.

#### NEW YORK DIVISION

AT NEW YORK, NEW YORK. Will through indices check determine if any references in New York files regarding Smith Barney Realty, 1345 Avenue of the Americas, New York, New York.

#### RICHMOND DIVISION

AT RICHMOND, VIRGINIA. Will through a review of indices files, review all information concerning the 1972 or 1973 files concerning

#### WASHINGTON FIELD DIVISION

AT WASHINGTON, D. C. Investigation continuing.

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| ,             |                           | Date 9/23/80   |  |
| TO:           | DIRECTOR, FBI (58-10334)  | )  |  |
| FROM:         | ASAC, ADM. DIV., WFO (18  | <b>A</b><br>83 <sup><b>1</b></sup> 514) (P) (SQUAD C-! | 5)   |
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|               | Enclosed for Bureau and   | Boston are one copy                                    | each   |
|               | candum from Departmental  | Attorney   |  |
| to Assista    | ant Attorney General PHII | LLIP B. HEYMANN.                                       |  |
|               | WFO is furnishing the en  | nclosed memorandum to                                  | keep   |
| the Bureau    | and Boston advised of a   |  |  |
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|   | Re WFO ai  | rtel to Char   | clotte d   | dated 8/1,   | /80.  |                  | A   |
|   | Boston Di  | vision is re<br>nications re   | equeste  | d to furn  | ish FBIH  | Q with           |     |
| Attorney General to 9/10/30 a r captioned r discussed involved in | coordina<br>meeting watter.<br>at length<br>n the Depo | mation of the has held with In this meet focusing prartment of Hiness Admini | een assing the stigation of the stigatio | signed by on of this aptioned r on the r and Urban | the Att<br>matter<br>egarding<br>matter w<br>individu<br>n Develo | orney On vas als | :1  |
| information   | n from the   | requeste<br>e Eoston Div   | ed that<br>vision:   | NFO obta:  | in the f  | ollowin          | 1g  |
|   |  |  | ,  | 158-10   | 7327-   | 19               | 7   |
| Eureau 2- Boston 1- WFO  RDK:mj1 (5)                              | (183-614)  | 31   |  | 2 <sub>750</sub> P P                               | 1990<br>W. H  | MANO<br>MS139    |     |
| Approved:   | 15/1/12  | Transmit   | ted(Num  | ber) (Tim  | ne)   | Per              | FE  |

FBI/DOJ

LEADS

#### BOSTON DIVISION

| AT BOSTON, MASSACHUSETTS: (1) Will furnish WFO appropriate investigative summary concerning the investigation and conviction of                  |
|--|
| (2) Will, through appropriate agencies (i.e., Probation Office, Internal Revenue Service (IRS) files) furnish information concerning the alleged |
|  |

b7C

- (3) Will, through appropriate officials, Massachusetts Department of Health or other related state agency dealing with the granting of state loans for mental hospitals, will ascertain who applied for the Don Loan for Glenside Hospital (1979). Further ascertain, if available, information relating to the amount of loan, date approved, participating financial institution, and any other information with respect to the Don Loan.
- (4) Will ascertain from Boston files and U. S. Attorney's (USA) Office, Eoston, Massachusetts, all cases relating to THOMAS P. O'NEILL, JR., and all others listed in WFO title that have been investigated over the last ten (10) years, and furnish WFO with brief summary of each investigation. Boston should advise WFO of the disposition of each case. If matter declined by USA's Office, state reasons for declination. If investigation currently being conducted, advise WFO of status.
- (5) Will, if possible, obtain a street map of only the Jamaica Plain area of Massachusetts.

#### WASHINGTON FIELD OFFICE

AT WASHINGTON, D. C.: Investigation continuing.

| FD-364(Rev. 7-27-76)                             | FBI   |  | 1                                |
|--|---|--|----------------------------------|
| TRANSMIT VIA:                                    | PRECEDENCE:   | CLASSIFICATION:  | i<br>                            |
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|  |   | Date9/15/80  | _ <del> </del>                   |
| TO   | DIRECTOR, FBI (5%-10  | 334)   |                                  |
| FROM   | SAC, MILWAUKEE (183-  | 339) (RUC)   |                                  |
| SUBJECT:   |   |  |                                  |
| •  | ET AL   | <del></del>  |                                  |
|  | RICO (A)  |  | b7C                              |
|  | OO: WFO   |  |                                  |
|  | rtel to Charlotte dat   | ed 8/1/80.   |                                  |
| For the i  | nformation of Bureau  | and WFO. contacts with   |                                  |
| stration   | (SRA) Modison Wisco   | Small Busines  | s Admini-                        |
|  |   |  |                                  |
| SBA, Madi<br>Leasing C<br>Louisiana<br>located a | orporation, Milwaukee<br>, have been negative.<br>lso regarding an SBA                          | ding files for Relocati<br>, and De Blois, Inc., N<br>Documents were attemp<br>lease guarantee of Glen | ew Orleans,<br>ted to be<br>side |
| well as R<br>and conta<br>within th<br>noted thi | elocation Leasing Cor<br>ct Agent made numerou<br>e SBA Madison Office<br>s office has moved si | s attempts to locate the with negative results. nce the 1971-1972 time                                 | e files<br>It is<br>period       |
| and many<br>been dest                            |   | are not longer current   | , have                           |
| A search<br>reference                            | of indices at SBA, Ma<br>to the above describ   | dison, failed to reflec  | t any                            |
| 2 - WFO (  | U (5 <b>6-</b> 10334) (AM)<br>183-514) (AM)   | b7C  |                                  |
| 1 - MILWA<br>NFP/lav<br>(5)                      | UKEE (183-339)  |  |                                  |
|  | 1-5131  |  |                                  |
| Approved (Ew)                                    | ing Transmitted   | (Number) (Time)  |                                  |
|  | <b>v</b> '  | WINDOW VITING!   | GPO: 1977 O - 225-539            |

MI 183-339

W . . .

| Milwaukee is not making | an atter | npt to contact | :   |         | b7C                    |
|-------------------------|----------|----------------|-----|---------|------------------------|
|                         | unless   | specifically   | set | forth b | <del>oy o</del> rıgın. |

In view of the fact no documents relative to the above described transactions can be located, Milwaukee is considering this matter RUC'd.

EPTEMBER 30, 1980

UNCLAS

ROUTINE

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FM DIRECTOR, FBI

TO: TO FBI, BOSTON ROUTINE

BT

14) UNCLAS

ETAL; RICO; BS 183-614; BLUE CHIP; RICO- 67C

12\_ITSP-FBW-MF; 00: BOSTON 183-608

REBUTELCAL TO BOSTON 9/25/80.

THIS IS TO CONFIRM THAT A MEETING HAS BEEN SCHEDULED AT FBIHQ AT 10:00 A.M., OCTOBER L, 1980, FOR PURPOSE OF DISCUSSING 8 CAPTIONED MATTERS.

THE MEETING IS SCHEDULED IN THE OFFICE OF DEPUTY ASSISTANT 6 DIRECTOR DANA E. CARO AND INCLUDED IN THE DISCUSSIONS WILL BE -DEPUTY ASSISTANT DIRECTOR CARO, SECTION CHIEF JOSEPH E. HENEHAN, SAC LAWRENCE SARHATT, CASE AGENTS FOR EACH CASE AND BUREAU SUPERVISOR OF RESPECTIVE CASES.

IT IS ANTICIPATED THAT BLUE CHIP WILL BE PRESENTED TO THE UNDERCOVER REVIEW COMMITTEE ON OCTOBER 7, 1980, AND INVIEW OF

9/30/80 58-10334 - FOF, BOSTON 1 - TRAVEL FOLDER federal bundau of investigation

2

| PAGE TWO DE HQ DD29 UNCLAS                    |     |
|---|-----|
| THIS IT IS REQUESTED THAT SA MAKE PLANS TO BE | b7C |
| PRESENT DURING THE PRESENTATION OF BLUE CHIP  |     |
| BT  |     |
| <b>‡</b>                                      |     |

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| <b></b>             | ·                                       |                           | _'   |
| TO:                 | DIRECTOR, FBI                           |                           | b7C  |
| FROM:               | SAC, MIAMI (183D-1078)                  | (P)                       | a service serv |
| SUBJECT:            |   | ]                         | ( )  |
|                     | ET AL                                   |                           | /  |
|                     | RICO (D) (OO: WASHINGTON FIELD          | OFFICE)                   |  |
|                     | Re Miami teletype to B                  | $\checkmark$              |  |
| <u>{</u>            |   |                           |  |
| rofloatin           | Enclosed for the Burea g interview with | au are two copies of an F | <u>'D-302</u>  |
|                     |   | or Washington Field Offic | e  |
| are origi           | nal and one copy of sam                 | ne FD-302.                |  |
|                     | LEAD                                    |                           |  |
| MTAMT               | <del></del>                             |                           |  |
| MIAMI               |   |                           |  |
|                     | AT WEST PALM BEACH, FI                  | LORIDA                    |  |
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| Division,           | serve subpoena duces t                  | tecum to                  | <del></del>  |
| and obtai           |   | nformation concerning app | raisals  |
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| - Lui               |   | $\mathcal{N}$             | /  |
|                     | (Encs.2)                                |                           |  |
| 2- Washir           | ngton Field Office (183-                | -514) (Squad C-3) (Encs.2 | 2)   |
| 2- Miami<br>DWC:ksc | 1.<131                                  |                           |  |
| 1                   |   |                           |  |

1300T 171980





#### FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/16/80 On September 9, 1980 was contacted by Special Agent's and furnished the b7C following information: requested an appraisal be conducted at Lake Hospital and Clinic, Inc., 1710 4th Avenue, Lake Worth, Florida. hoted that since he had previous experience in appraising medical facilities he accepted this particular job He explained the fee for each appraisal was between \$4,500 to \$5,000 all appraisals' fees have since been paid He recalled in reference to the appraisal of Glenside Hospital that it was paid with a \$500 deposit and payments of \$300 a month for 15 months. pointed out that each appraisal mentioned previously was based on the income approach and economic value of each hospital considering the potential success of the facility, if would operate each hospital after purchased, as outlined in statistics and related statements In conjuntion with furnished to this approach, interviewed current hospital administrators and analyzed all available facts and thereafter completed each appraisal, West Palm Beach, Florida File # MM 183D-1078 9/4/80 Investigation on\_ SA's

This document contains neither recommendations nor conclusions of the FBR it is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

MM 183D-1078 2

one occasion with and together they met with representatives of a local Real Estate Investment Trust office in the downtown section and specialized financing was discussed. These individuals, names and details unrecalled.

b7C

He located a copy of his appraisal report for Glenside Hospital, Jamaica Plains, Massachusetts, dated, December 29, 1971 and feels he probably has a copy of the other appraisals, previously mentioned and a search would be required since no cross reference filing system was used at his office in early 1970.

said he will be cooperative in this matter but requested he be served a supboena for documents and pertinent appraisals, listed above.

#### UNITED STATES GOVERNMENT

#### UNITED STATES DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION

# Memorandum

| TO | :DIRECTOR, | FBI |  |
|----|------------|-----|--|

DATE: 10/6/80

WFO M-ASAC (183A-514) (C-5) (P) SUBJEC

ET AL RICO (A) (00:WFO)

ReWFOairtel to Bureau, 8/1/80.

b7C

Enclosed for the Bureau are the original and four copies of an LHM reflecting investigation within captioned matter. One copy of said LHM is provided for information to the Boston Division.

WFO is furnishing Departmental Attorney Washington, D.C., a copy of the enclosure.

Due to the sensitive nature of this investigation, no dissemination of the enclosed LHM should be provided to outside parties.

15 OCT 7 1980

Bureau

- Boston (Enc. 1) 1- WFO

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JFK:smr (5)

10/19/80

1-08-2003

Buyy ເຄັ້ນ Savings Bonds Regularly on the Payroll Savings Plan



#### UNITED STATES DEPARTMENT OF JUSTICE

#### FEDERAL BUREAU OF INVESTIGATION

In Reply, Please Refer to File No. 183A-514

Washington Field Office Washington, D.C. 20535 October 6, 1980

> ET AL RICO (A) (OO:WFO)

> > b7C

During September, 1980, the Washington Field Office (WFO) of the Federal Bureau of Investigation (FBI) reviewed various public and governmental records from the following entities: Department of Housing and Urban Development (HUD), Small Business Administration (SBA), Securities and Exchange Commission (SEC), and Real Estate and Incorporation Records from Boston, Massachusetts. The following information was gleaned from the examination of the above documents:

Glenside, Incorporated, a Massachusetts corporation, and Medleg Associates, a Massachusetts real estate trust, formed during July, 1959. Thomas "Tip" O'Neill, current Speaker of the House of Representatives, was listed as a shareholder and Director of Glenside.

a shareholder of Glenside, Incorporated. Between 1959 and 1970, Medleg Associates acquired several continguous parcels of real estate in Jamaica Plain, Boston, Massachusetts, which included a psychiatric hospital with associate supporting structures. Glenside, Incorporated managed the hospital; Medleg owned the premises and leased the same to Glenside, Incorporated.

This document contains neither rec- Referral/Direct ommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

FBI/DOJ

| Ref | erra | al/ | Di | re | ct |
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|     |      |     |    |    |    |

Furthermore, O'Neill has been quoted by the newspaper "Boston Globe" (November 4, 1977) as stating he purchased 24 shares of Glenside stock in 1958 for \$10,000. In addition, O'Neill informed the newspaper that he received \$108,000 for the sale of his Glenside stock, \$50,000 at time of closing and the balance to be paid over the subsequent ten years. O'Neill has reported the proceeds of the Glenside sale on his Congressional Financial Disclosure Form as recently as May 8, 1980.

In addition to the various described transactions involving the Jamaica Plain's psychiatric hospital, O'Neill was involved in a \$150,000 SBA loan guarantee involving the Bristol Nursing Home, located in North Attleboro, Massachusetts. Review of public documents determined that prior to May, 1970, a partnership was formed in Massachusetts which included both O'Neill owning 11.25 percent of the firm. The partnership applied for a SBA loan guarantee for the \$150,000 through the Commonwealth Bank and Trust Company. On October 4, 1971, the partnership submitted a form to the SBA (Form 912) which listed O'Neill as a guarantor on the SBA loan quarantee. O'Neill specifically denied any interest in the Bristol Nursing Home partnership. The form purportedly contains the true signature of O'Neill. Further review of an SBA Office of Investigations report provides information that O'Neill contributed \$645 by check to his partnership capital account in May, 1971. Subsequent to the SBA approval of the loan (October 21, 1971), the partnership "forgave" a capital indebtedness of O'Neill to the firm for \$11,257.70. On July 1, 1973, the remaining partners distributed the deficit amount throughout the partnership. SBA did not consider the income tax impact of the distribution of O'Neill's indebtedness to O'Neill or the other partners.

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| Rev. 5-22-790                      |                     |                   |  | ę.                  |
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|                                    | FBI                 |                   |  | •                   |
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|                                    |                     | Date10/           | 1/80   |                     |
| TO: DIREC                          | TOR, FBI (58-10334) |                   |  |                     |
| FROM: ASAC,                        | ADM. DIV., WFO (18  | 3A-514) (P) (Squa | d C-5)   |                     |
|                                    |                     |                   |  |                     |
|                                    |                     |                   | /  |                     |
|                                    |                     |                   | 2. J   |                     |
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|                                    |                     |                   | N. A   | <i>f</i>            |
|                                    |                     | ,                 |  | <i>'</i>            |
|                                    |                     |                   |  | b7C                 |
| THOMAS P.O'NEI                     | LL, JR., aka        |                   | `  |                     |
| Tip/O'Neill,<br>Congressman,       | _                   |                   |  |                     |
| 8th Congression                    | al District,        |                   |  |                     |
| Boston, Massach                    | usetts;             |                   |  |                     |
|                                    |                     |                   |  |                     |
| Quali-Care, Inc<br>New Orleans, Lo |                     |                   |  |                     |
| New Offeans, LO                    | uisiana;            |                   |  |                     |
| Quali-Care, Inc                    |                     |                   |  |                     |
| Quali-care, inc                    | • i                 |                   |  |                     |
| (title continue                    | d on page 2)        | 100               |  |                     |
|                                    |                     |                   |  |                     |
| Bureau<br>2- Boston                |                     |                   |  |                     |
| 2- Indianapolis                    |                     |                   | E OUT !  | 3 74                |
| 2- Milwaukee<br>2- New Orleans     | •                   |                   | Agragia ( 51) Sept. Sept | . 1752 19 Se months |
| 1- WFO                             |                     | <u>\$</u>         | 1  |                     |
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| (11)                               | 2)                  |                   | -  | PHA                 |

| Approved: WSR |              |          |        |     |
|---------------|--------------|----------|--------|-----|
| Approved: MY  | Transmitted. | (Number) | (Time) | Per |

JPR TRUSTEE FUND;

BRISTOL NURSING HOME;

GLENSIDE HOSPITAL;

DE BLOIS, INC.;

QUALI-CARE OF LOUISIANA;

QUALI-CARE OF DELAWARE;

QUALI-CARE OF MASSACHUSETTS;

RICO (A);

(OO:WFO)

b7C

Re WFO airtel to the Bureau dated 4/30/80.

For those offices not previously advised, Bureau requested that all offices provide copies of all communications between divisions to FBIHQ.

The information contained in captioned investigation was obtained from a WFO source, records from the Department of Housing and Urban Development (HUD), Washington, D. C. (WDC); Small Business Administration (SBA), WDC; and the Securities and Exchange Commission (SEC), WDC.

The allegation to date against et al, is that they act as "straw men" for THOMAS P. O'NEILL, JR., Speaker of the House of Representatives, in various business dealings (i.e., nursing homes, etc.). There are also allegations that O'NEILL is presently involved in the operation of Quali-Care, Inc., a New Orleans, Louisiana, corporation. This corporation is alleged to be controlled by organized crime in New Orleans, Louisiana.

This matter reflects allegations beginning in 1970 through 1972; however, WFO is viewing this matter as an ongoing conspiracy regarding the allegation with respect to the HUD loan granted to the Pondview Associates in 1972. HUD officials, WDC, advised that as of 1979, the loan was in default.

Departmental Attorney U. S. Department of Justice (USDJ), WDC, is coordinating the prosecutorial direction in this matter. requests that all leads be expeditiously handled in this matter.

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|---|---|---|---|---|
|   |   |   |   |   |

### BOSTON DIVISION

| AT BOSTON, MASSACHUSETTS: (1) Will, through appropriate officials at the Massachusetts Department of Insurance, Boston, Massachusetts, attempt to obtain any information concerning Frank Hennessy Insurance Co., Boston.  |
|--|
| (2) Will, through appropriate records (i.e., police, etc.), attempt to locate resident.  |
| (3) Will, through appropriate officials at Suffolk County, determine if any building contracting firms operated by are registered with the county. Will obtain any information regarding those firms.  |
| (4) Will, through appropriate credit checks, obtain the credit printout for the following individuals and companies and forward the printouts to WFO. Will, on those individuals with no address or no accurate address, attempt to obtain correct address and submit credit checks. |
|  |

Eastern Survey and Engineering Co. 103 North Main Street Cohasset, Massachusetts

Glenside, Inc. 49 Robinwood Avenue Jamaica Plain, Massachusetts

Pondview Apartment Associates
P. O. Box 31
Cambridge, Massachusetts

Paper Realty Trust Boston, Massachusetts

Bristol Nursing Home 1000 Oak Hill Avenue Attleboro, Massachusetts

Broadway Capital Fund Boston, Massachusetts

Medleg Associates Boston, Massachusetts

Stonehenge Restaurant (formerly Country Squire Inn) Middleton, Massachusetts

Two Pal Realty Trust East Boston, Massachusetts

J.P.R. Trust Fund Boston, Massachusetts

Row Bro Realty Trust Wellesley, Massachusetts

Exeter Secured Fund
East Boston, Massachusetts

Buswell Realty Trust Boston, Massachusetts

AT MIDDLETON, MASSACHUSETTS: Will, through appropriate officials at the Massachusetts Department of Liquor Licenses, obtain copies of all license applications for Stonehenge Restaurant, also known as (aka) Country Squire Inn, Middleton, Massachusetts, from 1968 through 1976.

- (2) Will attempt to determine if had any interest, either actual or hidden, in the Country Squire Inn, Middleton, Massachusetts.
- (3) Will attempt to obtain copies of the entire police file concerning any arson investigation conducted by the Middleton Police Department or any surrounding police department concerning any fire at the Country Squire Inn, aka Stonehenge Restaurant.
- (4) Will contact appropriate officials at the appropriate fire marshal covering the Middleton area and obtain copies of any reports they may have concerning any fire at the Stonehenge, aka Country Squire Inn.
- (5) Will attempt to locate the whereabouts of

b7C

- (6) Will, upon locating interview him concerning any information he may provide relating to a 1971 fire at the Country Squire Inn.
- (7) Will, through appropriate officials at Massachusetts Department of License, determine if

Federal Savings and Loan Association, Lexington, Massachusetts, has any interest in the liquor license for Country Squire Inn.

| INDIANA | POLIS | DIVIS | ION |
|---------|-------|-------|-----|
|---------|-------|-------|-----|

| AT FORT BENJAMIN HARRISON, INDIANA: Will to locate and review the military personnel file for  |   |
|--|---|
|  | -140                                    |
| MILWAUKEE DIVISION   |   |
| AT MILWAUKEE, WISCONSIN: Will, through appropriate credit checks, obtain the credit printout for the following individuals and companies and forward the printouts to WFO. | b7C                                     |
|  |   |
| Relocation Leasing Corp. 614 West Brown Deer Road Milwaukee, Wisconsin   | • |
| NEW ORLEANS DIVISION   |   |
| AT NEW ORLEANS, LOUISIANA: Will, through appropriate credit checks, obtain the credit printout for the following individuals and companies and forward printouts to WFO.   |   |
|  |   |
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DeBlois, Inc. New Orleans, Louisiana

Quali-Care of Louisiana New Orleans, Louisiana

Quali-Care of Massachusetts New Orleans, Louisiana

Health Services, Inc. New Orleans, Louisiana

| · K.                                 | FB                                       | T  |  |
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| TRANSMIT VIA:                        | PRECEDENCE:                              | CLASSIFICATION:  |  |
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|                                      |  | UNCLAS   | į<br>į   |
|                                      |  | Date 9/29/80   |  |
| TO: DIRECT                           | OR, FBI (58-10334)                       |  |  |
| FROM: WASAC,                         | ADM. DIV., WFO (18                       | 33A-514) (P) (SQUAD C-5)   |  |
|                                      | b7C                                      |  |  |
| Et Al;                               |  |  |  |
| RICO (A);<br>(OO:WFO)                |  |  | ,  |
|                                      |  | $\mathcal{L}_{V}$  |  |
| Re WFO                               | airtel to Bureau                         | dated 8/11/80.   |  |
| Boston copies of all co              | Division is reque                        | sted to forward to FBIH ding captioned matter.                       | Q  |
| <u>LEADS</u>                         |  |  | the state of the s |
| ROSTON DIVI                          | SION                                     |  |  |
| officials, Depar<br>attempt to obtai | tment of Corporati<br>n copies of the Ar | ons, Boston, Massachuse ticles of Incorporation Inc., Jamaica Plain, | tts,   |
|                                      |  |  | 11   |
|                                      |  | -8   |  |
| (2) - Bureau                         |  | · •  |  |
| 2 - Boston                           |  | •  | 15 E 18 1  |
| 1 - WFO                              |  |  |  |
| RDK:1j1 / 3                          | , }                                      | · . }  |  |
| (5)                                  |  | ,  |  |
| Approved:                            | Transmitted _                            | (Number) (Time)  |  |

(2) Will attempt to obtain any and all records relating to amendments to the original Glenside, Inc. (1958) incorporation as it relates to stock purchase former directors, former stockholders, changes in the amount of shares and any and all information relating to Glenside, Inc., in the Department of Corporation's files.

| to   lemployment and along                                |
|---|
| with background information relating to her. (Note: It is |
| believed that unknown b7C                                 |
| whether state or federal.)                                |
| ·   |
| (4) Will through Boston files determine the present       |
| location of   |
| Will turnish all  |
| FD-302's and other court transcripts concerning           |
|   |
| (5) Will, if possible, determine if                       |
|   |
|   |
|   |

(3) Will attempt to obtain all information regarding

- (6) Will through appropriate officials, Department of Corporations, Boston, Massachusetts, obtain copies of the corporate records for Old Town Landscaping Services, Inc., Wellsley, Massachusetts.
- (7) Will through appropriate officials, Department of Corporations, Boston, Massachusetts, obtain copies of the corporate records for Buswell Realty and Development Company, Boston, Massachusetts.
- (8) Will from appropriate officials, Recorder of Deeds, Boston, Massachusetts, obtain copies of all deeds available for the below listed trusts from 1958 through 12/31/73.
  - A. Paper Realty Trust Boston, Massachusetts
  - B. Buswell Realty and Development Company Trust Boston, Massachusetts
  - C. Rowbro Realty Trust Wellsley, Massachusetts

- (9) Will through appropriate street guides, Boston, Massachusetts, for the year 1959, determine who resided at
- (10) Will through appropriate records, Recorder of Deeds, Boston, Massachusetts, attempt to obtain any information to a mortgage by Medleg Associates on 4/27/71, with the Garden City Trust Company (i.e. how much was the loan, etc.).
- (11) Will through appropriate credit checks and other available agencies determine the biological relationship between the following individuals:



data on Avenue, Jamaica Plain, Massachusetts, home address
Social Security Account Number

(13) Will through appropriate officials at the Department of Corporations, Boston, Massachusetts, obtain corporate records for JAB Enterprises, Inc., Middleton, Massachusetts.

b7C

(14) Will through appropriate officials at the Recorder of Deeds, Boston, Massachusetts, obtain copies of the trust and properties of \_\_\_\_\_\_\_ of Desk Realty Trust, under declaration of trust dated 10/4/68, and recorded with Suffolk Deeds, Book 8236, Page 703, by deed dated 4/14/71.

### WASHINGTON FIELD DIVISION

AT WASHINGTON, D. C. Investigation continuing.

|                                | FB   | . <b>L</b>                            |  | ء ا      |
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| TRANSMIT VIA:                  | PRECEDENCE:  | CLASSIF                               | CATION:  | - [      |
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| Facsimile                      | Priority   | ☐ SECRI                               | ΞT   | j        |
| airtel                         | Routine  | CONF                                  | IDENTIAL   | j        |
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|                                |  | Data                                  | 10/9/80  | į        |
|                                |  |                                       |  |          |
| TO: DIRECTO                    | R, FBI (58-10334)  |                                       |  | 1. 1     |
| FROM: ASAC, A                  | DM. DIV., WFO (18  | 832-514) (P)                          | (Smad C-5  | 1 15     |
| Thom: Mone, A                  | DEL DIV., WEO (10  |                                       | (bquau c b   | ,        |
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|                                |  |                                       |  | 1.10     |
| THOMAS P. O'NEILL Tip O'Neill, | , JR., aka   |                                       |  | pu       |
| Congressman,                   |  |                                       | ;  | l        |
| 8th Congressional              |  |                                       |  |          |
| Boston Massachuse              | etts:  |                                       |  |          |
| 1                              |  |                                       |  |          |
| Quali-Care, Inc.,              |  |                                       |  |          |
| New Orleans, Louis             | siana:   |                                       |  |          |
|                                |  |                                       |  |          |
| Quali-Care, Inc.;              |  |                                       |  |          |
| ×                              |  |                                       |  |          |
| (title continued o             | on page 2)   |                                       |  |          |
|                                |  |                                       |  | , .      |
| 2 Bureau                       |  | *****                                 |  | <i>,</i> |
| 2- Boston                      |  |                                       | Sale of Cas  | •        |
| 2- Miami<br>2- St. Louis       |  |                                       | g (10° )   | 1 NEW 1  |
| 2- Tampa                       |  |                                       | · · · · ·  |          |
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| RDK:mjl                        |  | · · · · · · · · · · · · · · · · · · · | J.   | 1        |

FBI/DOJ

JPR TRUSTEE FUND;
BRISTOL NURSING HOME;
GLENSIDE HOSPITAL;
DE BLOIS, INC.;
QUALI-CARE OF LOUISIANA;
QUALI-CARE OF DELAWARE;
QUALI-CARE OF MASSACHUSETTS;
RICO (A);
(OO:WFO)

Re WFO airtel to the Bureau dated 4/30/80.

For those offices not previously advised, Bureau requested that all offices provide copies of all communications between divisions to FBIHQ.

All offices are advised that this matter is of a sensitive nature and is to be handled accordingly. The enclosed information is to be provided on a need-to-know basis only.

The information contained in captioned investigation was obtained from a WFO source, records from the Department of Housing and Urban Development (HUD), Washington, D. C. (WDC); Small Business Administration (SBA), WDC; and the Securities and Exchange Commission (SEC), WDC; etc.

In July, 1959, two statutory Massachusetts entities were established. One, a corporation, Glenside, Inc., the other apparently a Massachusetts real estate trust, Medleg Associates. Mr. O'NEILL was a shareholder and a director of Glenside.

The details of Medleg but a degree of

composition are not known at this time but a degree of community of interest between Glenside (the coporation) and Medleg (the trust) existed on the basis of common ownership of both by various parties listed on public records.

| Between 1959 and 1970 Medleg acquired several continguous parcels of real estate in Jamaica Plain, Bos including 49 Robinwood Avenue (a psychiatric hospital wi associated supporting structures). Glenside, Inc., open the hospital, Medleg rented the premises to Glenside. The details of these arrangements are not yet known since rehave not all been made available.  Referral/D | th<br>ated<br>he<br>cords |
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| WFO 183A-514   |
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| Departmental Attorney U. S. Department of Justice (USDJ), WDC, is coordinating the prosecutorial direction in this matter. requests that all leads be expeditiously handled in this matter.  |
| LEADS  |
| BOSTON DIVISION  |
| AT BOSTON, MASSACHUSETTS: (1) Will, through appropriate officials at the Recorder of Deeds Office, Suffolk and Essex Counties, determine if those offices' tax stamps on sales of properties is indicative of the actual selling price of properties in Massachusetts. |
| (2) If the answer is yes, determine from the tax stamps the selling price regarding the following property sales.  |
| (a) Paper Realty Trust, sale of the Centre Street Apartments, 560-566 Centre Street, Jamaica Plain, Massachusetts, on 4/21/71 for \$520,000.   |
| (b) Glenside, Inc., Jamaica Plain, Massachusetts, sale to Pondview Apartments Associates of the Centre Street Apartments, 560-566 Centre Street, Jamaica Plain. Quali-Care covenants on 7/21/72 for \$500,000.   |
| (c) Relocation Leasing Corp., Milwaukee, Wisconsin, purchase of Glenside Hospital Properties, 49 Robinwood Avenue, Jamaica Plain, from Medleg Associates on 11/14/72 for \$900,000.  |
| (3) Will, through indices, criminal, and<br>credit checks, determine the present whereabouts for the<br>following individuals:   |
| •  |

| Note: |  |
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- (4) Will, through appropriate officials at the Massachusetts Department of Food Licenses, Boston, determine who applied for the food license for Country Squire Inn, Middleton, from 1966 through 1973.
- (5) Will, through appropriate officials at the Department of Corporations, Boston, obtain copies of the Articles of Incorporation for Horwood, Inc., from 7/20/59 to present, including all amendments, directors, etc.

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- (6) Will, through appropriate officials, Recorder of Deeds, Suffolk County, Massachusetts, obtain copies of all deeds of properties sold or purchased by Horwood, Inc., from 1959 through present.
- (7) Will, through appropriate officials at the Department of Corporations, Boston, obtain copies of the Articles of Incorporation for I. Ginsberg & Sons, Inc., Boston, including amendments, directors, etc.

| _         | (8) | Will | attem | ot to | obtain | backgr | ound | informa | tion |
|-----------|-----|------|-------|-------|--------|--------|------|---------|------|
| regarding |     |      |       |       |        |        |      |         |      |
|           |     |      |       |       |        |        |      |         |      |
|           |     |      |       |       |        |        |      |         |      |
| •         |     |      |       |       |        | _      |      |         | _    |

AT MIDDLETON, MASSACHUSETTS: (1) Will attempt to obtain information from appropriate county service station license officials concerning

(2) Will obtain from appropriate officials who referee insurance claims, that are in dispute, and obtain information they may have concerning the Country Squire Inn, Middleton, fire in 1971.

| (3) Will obtain from the appropriate officials at the Recorder of Deeds, Essex County, Massachusetts, a copy of the deed of purchase of the Country Squire Inn property Will, if possible, also obtain the following document: the mortgage holder, real estate agent, and the closing document. |
|--|
| (4) Will, through appropriate officials at the Recorder of Deeds covering Middleton, Massachusetts, obtain information regarding the sale of the Country Squire Inn, Midleton, properties  Will also determine from whom and when piece of property was purchased                                |
| AT LAWRENCE, MASSACHUSETTS: (1) Will, from appropriate banking officials, obtain information relating to ownership, directors of the Arlington Trust Bank, Lawrence, Massachusetts.  |
| AT CONCORD, NEW HAMPSHIRE: (1) Will, through appropriate officials at the New Hampshire Group Insurance, possibly Concord, New Hampshire, obtain information regarding a \$350,000 insurance policy, on Country Squire Inn, Middleton, Massachusetts, in 1971 or 1972.                           |
| AT EXETER, NEW HAMPSHIRE: (1) Will, through appropriate officials at the Department of Corporations, Concord, New Hampshire, obtain copies of the Articles of Incorporation for Exeter Fund, Exeter, New Hampshire, including amendments, directors, etc.  |
| (2) Will, through appropriate officials Exeter  Bank, 154 Water Street, Exeter, New Hampshire (i.e., attempt to  determine if the Exeter Fund account is handled by that bank.   |
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| IMKIM | DIVISION | V |
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| AT MIAMI, FLORIDA: (1) Will obtain copies of the investigative reports for Miami File and forward same to WFO.  | b7C   |
|---|-------|
| (2) Referenced teletype to Director dated 10/9/80, Miami, is advised that WFO has no street address for Banyon Kennels, West Palm Beach, Florida; however, Banyon Kennels is a dog racing track.    |       |
| (3) Will, through appropriate officials Miami Racing Licenses Commission (or similar commission), Miami, Florida, obtain information as to the address, licensing, owners, etc., of Banyon Kennels. | . * * |
| ST. LOUIS DIVISION  |       |
| AT ST. LOUIS, MISSOURI: (1) Will disregard lead in WFO airtel to Bureau dated 9/4/80 concerning the review of personnel file on WFO has obtained official personnel file and will review same.      |       |
| TAMPA DIVISION  |       |
| Tampa investigative reports,  Concerning  and forward same to  WFO.   | b7C   |

## WASHINGTON FIELD OFFICE

AT WASHINGTON, D. C.: Investigation continuing.

| •  | FBI  |   | •        |
|--|--|---|----------|
| TRANSMIT VIA:  Teletype Facsimile AIRTE  | ☐ Immediate<br>☐ Priority  | CLASSIFICATION:  TOP SECRET  SECRET  CONFIDENTIAL  UNCLAS E F T O | ,<br>b7C |
|  |  | □ UNCLAS  Date 9/16/80  | b7D      |
| TO:<br>FROM: 12  | DIRECTOR, FBI (5 <b>8</b> -10334) SAC, ALEXANDRIA (183-235)  |   | 7,       |
| D-   | Thomas P./W'Neill, Jr. Congressman 8th Congressional District Boston, Massachusetts; ET AL RICO (D) (00:WF0) | t.  |          |
| to the Bu  | Re Alexandria airtel to Wireau, 8/11/80.   |   | rtel     |
|  | 」<br>l. Olympus Research Corp  | oration   |          |
|  | 2. Congress Capital Corp   | oration   |          |
|  | 3. Continental Shelter C   | orporation  |          |
|  | 4. Continental Wingate C   | ompany, Incorporated  |          |
| Description of the second seco | 5. Kelwin Company, Incor-<br>-514) (Encs. 8)<br>ia   | porated   |          |

Approved: \_\_\_\_\_\_ Per \_\_\_\_\_ Per \_\_\_\_

## AX 183-235

- 6. Barclay House, Incorporated
- 7. Jamaicaway Development Trust
- 8. Beacon Construction Company, Incorporated

| -36 (Rev. 5-22-78)  |  |  | 4  |
|---|--|--|--|
| -30 (itev: 6-22-10)   | FB:  | Ī  | į  |
| TRANSMIT VIA:   | PRECEDENCE:  | CLASSIFICATION:  | b7C  |
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| □ Facsimile   | Priority   | SECRET   | i<br>I   |
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|   |  | Date10/9/8   | . !  |
|   |  | Date   | <del> </del> -   |
| TO: DIRECT  | OR, FBI (58-10334)   |  |  |
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| FROM SAC, N   | EW ORLEANS (183D46)  | +) - P -   | E Sales 1 January 1  |
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| ET AL;  |  | / / 110  | <i>3</i>   |
| RICO (A);   | a.i.borik  |  |  |
| 00: WFO   |  | /  |  |
|   |  |  |  |
| Re New  | Orleans airtel to  | WFO dated 8/29/80.   |  |
| 02 10/  | 1/80 inquiries at  | Department of Corp   | orations   |
| Secretary of Sta  | te, Baton Rouge, Lo  | ouisiana, determine nat office re the f  | d no   |
| Quali<br>Health<br>DeBloi<br>Humana<br>Glensi<br>Human<br>Americ                    | Services, Inc., No., Inc., New Orlean, Inc., Louisville de, Inc., Boston, Services, Inc., New an Medicorp, Louis | New Orleans, Louis<br>ew Orleans, Louisia<br>ns, Louisiana<br>, Kentucky<br>Massachusetts<br>w Orleans, Louisian | na<br>a  |
| District Court, was filed on 12/  | Parish of Orleans, 2/79, by George Ta: Oualicare, Inc.;  | records at the Cler<br>New Orleans, deter<br>lbott with defendan<br>John M. DeBlois; G<br>d defendants were i    | mined a suit<br>ts listed<br>erald DeBlois   |
|   |  | for the same of  | A STATE OF THE PARTY OF THE PAR |
| 2 - Bureau<br>2 - WFO (183A-51  | 4) 31  |  | A second   |
| 2 - New Orleans   | 1/51/  |  |  |
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| 2 - WFO (183A-51<br>2 - New Orleans<br>FNC/lav<br>(6)  -cc- ccc <br>  (6)  -cc- ccc |  |  | -/   |
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NO 183D-464 FNC/lac

Talbott in the amount of \$1,900 for past salary and expenses and due to business setbacks, defendants could no longer keep Talbott in their employ. Defendants were all served with process at 110 Veterans Highway, Suite 377, Metairie, Louisiana. Talbott was represented by Attorney C. T. Williams, Jr., Suite 1350, 1010 Common Street, New Orleans, Louisiana. Defendants were represented by Attorney Leon H. Rittenberg, Jr., 1006 Hibernia Bank Building, New Orleans. The suit was settled out of court and the suit was dismissed on 8/15/75, on motion by Talbott.

No other suits were located re DeBlois, Inc.; DeBlois Chander, Inc., or Qualicare of Louisiana, Inc.

On 10/2/80, a review of records at the Convevance Office, Parish of Orleans, New Orleans, determined DeBlois, Inc., 1625
Belle Chasse Highway, Gretna, Louisiana, represented by John DeBlois, purchased property located at 7805 St. Charles Avenue, New Orleans, from Security Homestead Association for \$48,750. The transaction was listed under number 707-593.

No other purchases were located for subject companies during period 1/1/70 - 12/31/72.

On 10/2/80, inquiries at Assessors Office, Parish of Orleans, New Orleans, were negative re any assessments for properties of DeBlois, Inc., during period 1/1/70 - 12/31/72. Property located at 145 Robert E. Lee Boulevard, New Orleans, was not assessed until 1973 when a three story office building was constructed on the property owned by F. S. Lupo. Apparently DeBlois, Inc., merely had office space in the building.

#### LEAD

#### NEW ORLEANS DIVISION

AT NEW ORLEANS, LOUISIANA. Will continue review of public records and conduct credit checks.



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| TRANSMIT VI            | A: PRECEDENCE:   | CLASSIFICATION:  |       |
|------------------------|--|--|-------|
| Teletype               | Immediate  | ☐ TOP SECRET   | i     |
| Facsimile              | Priority   | ☐ SECRET   | İ     |
| airtel                 | Routine  | CONFIDENTIAL   | 1     |
|                        |  | ☐ UNCLAS E F T O   |       |
| N A                    |  | ☐ UNCLAS   |       |
|                        |  | Date10/17/80   | -     |
| TO:                    | DIRECTOR, FBI (58-10334  | ) / / /  |       |
| FROM:                  | SAC, WFO (183A-514) (P)  | (Squad C-5)  |       |
|                        |  | (Squad C-5)  |       |
| Et Al;<br>RICO;        | b7C  |  | 1,373 |
| (00:WFO)               |  | a Link "   |       |
|                        | •  | Abstract to  | 1     |
|                        | Re WFO airtel to the Bur   | eau dated 9/29/80.   |       |
|                        | All offices are advised  | that FBIHQ requests cop:   | ies   |
| of all co              | ommunications between divi   | sions.   |       |
| to review              | For additional backgroun are requested, due to the vindividual office files ations) for any additional | sensitive matter involve<br>(i.e., previous  | ed,   |
| received<br>basis onl  | All offices are further from WFO or provided to $W$  |  |       |
| 2- Bureau<br>2- Boston | 1  | 10031-2  | le f  |
| 2- Miami               | .1   | . 5.70   |       |
| 2- New Or<br>1- WFO    |  | The second of th | /     |
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Transmitted \_

(Time)

FBI/DOJ

LEADS

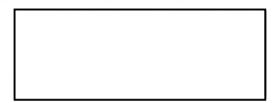
#### BOSTON DIVISION

AT BOSTON, MASSACHUSETTS: (1) Will, through appropriate officials at the State Board of Accountancy, Boston, obtain copies of the personal and partnership disclosure statements (i.e., license applications) for the below listed CPA firms:

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- (2) Will obtain a copy of the Massachusetts law relating to accountancy.
- (3) Will, through appropriate officials, Department of Corporations, Boston, obtain copies of the Articles of Incorporation for the Robinwood Trust, Jamaica Plain, Massachusetts.

- (4) Will, through appropriate officials, Recorder of Deeds, Suffolk County, Massachusetts, obtain copies of all properties purchased or sold by the Robinwood Trust from 1977 through present.
- (5) Will attempt through appropriate indices, credit and criminal checks, obtain the present location of the below listed individuals.



(6) Will, through appropriate officials at the City of Boston, Building License Department, Boston, obtain copies of the building license permits, inspection permits, and building violations for the below listed buildings from 1962 through 1972.

Centre Street Apartments 560-568 Centre Street Jamaica Plain, Massachusetts

Glenside Hospital 49 Robinwood Avenue Jamaica Plain, Massachusetts

AT ATTLEBORO, MASSACHUSETTS: (1) Will, through appropriate officials at the City of Attleboro, Building License Department, Attleboro, Hassachusetts, obtain copies of the building license permits, inspection permits, and building violations for the below listed buildings from 1968 through 1972.

Bristol Nursing Home 1000 Oak Hill Avenue Attleboro, Massachusetts

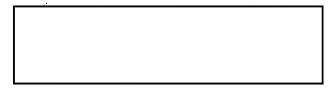
#### MIAMI DIVISION

AT MIAMI, FLORIDA: (1) Regarding Miami teletype to Director dated 10/7/80, Miami is advised to conduct appropriate checks at the Department of Health Services or similar agencies relating to health care licenses of hospitals and obtain information concerning Lake Hospital affiliation with Banyon Institute.

- allegedly Any association between Banyon Kennels and Lake Hospital is of important interest to WFO.
- (3) Will attempt to obtain any information as to whether Banyon Institute and Banyon Kennels are related by virtue of ownership or directors.

#### NEW ORLEANS DIVISION

AT NEW ORLEANS, LOUISIANA: (1) Will, through appropriate officials at the State Board of Accountancy, New Orleans, obtain copies of the personal and partnership disclosure statements (i.e., license applications) for the below listed CPA firms:



(2) Will obtain a copy of the Louisiana law relating to accountancy.

#### WASHINGTON FIELD OFFICE

AT WASHINGTON, D. C.: Investigation continuing.

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OO HQ BS LV

DE WF #0021 3022145

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FM WASHINGTON FIELD (183A-514) (P) (C-3)

TO: DIRECTOR, FBI (58-12934) CANCIMMENTATE)

ATTN: WHITE COLLAR CRIME SECTION

FBI BOSTON (183-614) (IMMED IATE)

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FBI LAS VEGAS (IMMEDIATE)

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SECTION 1 OF 2

ALSO KNOWN AS, ET AL; RICO (A); OO:WFO

RE WFO AND BOSTON MEETING AT FBIHQ ON OCTOBER 6, 1980; WFO TELEPHONE CALL TO BUREAU ON OCTOBER 28. 1980.

AS THE BUREAU IS AWARE, WASHINGTON FIELD OFFICE AGENTS
AND BOSTON AGENTS ON OCTOBER 21, 1980, THROUGH OCTOBER 23,
1980, CONDUCTED NUMBEROUS INTERVIEWS IN THE BOSTON AREA
RELATING TO SEVERAL FIRES AT THE COUNTRY SQUIRE INN,
MIDDLETON, MASSACHUSETTS. THE PURPOSE OF THESE INTERVIEWS
WAS TO DETERMINE TO WHAT EXTENT WAS THE INVOLVEMENT OF
CAPTIONED SUBJECTS IN RELATIONSHIP TO THE SMALL BUSINESS
ADMINISTRATION (SBA) LOAN GRANTED TO COUNTRY SQUIRE INN AND ALSO

10

PAGE TWO DE WF 0021 U N C L A S
TO WHAT EXTENT WAS CAPTIONED SUBJECT INVOLVED IN THE ARSON
FOR PROFIT OF THE COUNTRY SQUIRE INN.

THE INTERVIEWS CONDUCTED TO DATE WERE NOT CONCLUSIVE,

IN THAT THEY DID NOT SPECIFY OR NAME ANY OF THE CAPTIONED

SUBJECTS AS BEING PHYSICALLY INVOLVED IN BOTH ACTS PREVIOUSLY

MENTIONED CONCERNING THE COUNTRY SQUIRE INN. THE INTERVIEWS

HOWEVER WERE VERY PRODUCTIVE IN THAT IT WAS DETERMINED THAT

THE FOUR FIRES ATTHE COUNTRY SQUIRE INN WERE DELIBERATLEY

SET TO PAY OFF DEBTS BY THE OWNERS. THE INDIVIDUALS INVOLVED

IN THE DISPUTED OWNER SHIP OF THE COUNTRY SQUIRE INN AS REFELCTED

BY THE INTERVIEWS WERE POSSIBLY

WHO BASED

ON HIS FINANCIAL SITUATION AT THIS TIME HAD TO BE ACTING IN

SOMEONE STEAD.

THE INTERVIEWS ALSO DETERMINED THAT

MAY

HAVE BEEN INVOLED IN THE PROCURING OF THE ARSONIST TO BURN

THE INTERVIEWS ALSO DETERMINED THAT

MAY

HAVE BEEN INVOLED IN THE PROCURING OF THE ARSONIST TO BURN

THE COUNTRY SQUIRE INN. DURING THE NIGHT OF ONE OF THE FIRES

AT COUNTRY SQUIRE INN, WAS OBSERVED BY TWO

MIDDLETON POLICE OFFICERS IN A VEHICLE, THAT PREVIOUSLY WAS

PAGE THREE DE WF 0021 UNCLAS

| PARKED AT THE COUNTRY SQUIRE INN, MOVING SLOWLY DOWN ROUTE        |
|---|
| ONE A SHORT DISTANCE FROM THE COUNTRY SQUIRE INN. THE TWO         |
| POLICE OFFICERS STOPPED THE VEHICLE AT APPROXIMATELY THIRTY       |
| MINUTES PRIOR TO THE ALARM BEING SOUNDED. THIS STOP AS            |
| RECALLED FROM THE NOTES OF STATE FIRE MARSHALL RESULTED IN THE    |
| IDENITY OF THE IDENITY  |
| OF  |
| FILED BY ON   |
| THAT EVENING WAS MIDDLETON POLICE                                 |
| DEPARTMENT. IS THE AUTHOR OF THE FOLLOWING                        |
| INFORMATION PROVIDED TO THE FEDERAL BUREAU OF INVESTIGATION BY 57 |
| SPECIAL AGENT IN CHARGE MARTIN NORTON, HEALTH AND HUMAN b7        |
| SERVICES (HHS), BOSTON, MASSACHUSETTS.                            |
| IS REPORTEDLY   |
| VERY KNOWLED GEABLE ABOUT THE FIRES AT THE COUNTRY SQUIRE INN     |
| AND IS REPORTED TO HAVE ADVISED ONE SOURCE AS FOLLOWS:            |
|   |
|   |

PAGE FOUR DE WF 0021 U N C L A S

| WERE OBSERVED BY POLICE LEAVING THE                          |
|--|
| RESTAURANT SHORTLY BEFORE THE JANUARY 22, 1971, FIRE.        |
| FILED ARSON CHARGES AGAINST                                  |
| BUT NO PROBABLE CAUSE WAS FOUND IN THE LOCAL (SALEN)         |
| DISTRICT COURT.  |
| REPRESENT HIM IN THE CASE. WHEN THE MASSACHUSETTS STATE      |
| FIRE MARSHAL OPENED AN INVESTIGATION OF THE FIRES, STATE     |
| POLICE WAS PUT IN CHARGE OF IT. HE WAS                       |
| LATER MOVED FROM THE INVESTIGATION AND WAS REPLACED BY STATE |
| POLICE   |
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| PAGE FIVE DE WF Ø 021 U N C L A S                          |
|--|
| IN THE MIDDLETON RESTAURANT FROM THE VERY BEGINNING.       |
| D ID A LOT OF WORK AT THE COUNTRY SQUIRE INN               |
| IN 1966 AND 1967, AND RECALLED THAT WAS AROUND THE         |
| PLACE EVEN THEN. ALSO TOLD A SOURCE THAT                   |
|  |
| WAS ALSO INVOLVED  |
| IN THE RESTAURANT WITH BASED ON CONVERSATIONS WITH         |
| AND OTHER SOURCES, REPORTEDLY CLAIMED THAT                 |
| THE PEOPLE BEHIND APPARENTLY THE BENEFICIARIES OF JPR      |
| TRUST, INCLUDED CONGRESSMAN THOMAS P. "TIP" O'NEILL, JR'., |
| A ND   |
|  |
|  |
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|  |

PAGE SIX DE WF 0021 U N C L A S IT SHOULD BE NOTED THAT WAS ALSO INSTRUMENTAL IN b7C b7D DURING THE INTERVIEW OF HE DENIES EVER SEEING IN THE VEHICLE WITH THE INVESTIGATIVE NOTES OF INDICATED THAT TOLD HIM THAT WAS IN THE VEHICLE WITH THE INTERVIEW WITH FOR TWENTY REFLECT THAT HE HAS KNOWN AFTER THE FIRES TO YEARS. COUNTRY SQUIRE INN,





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VZCZCWF0725

OO HQ BS LV

DE WF #0034 3022156

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0 282143Z OCT 8Ø

FM WASHINGTON FIELD (183A-514) (P) (C-3)

TO DIRECTOR, FBI (58-10334) (IMMEDIATE)

ATTN: WHITE COLLAR CRIME SECTION

FBI BOSTON (183-614) (IMMED IATE)

FBI LAS VEGAS (IMMEDIATE)

BT

UNCLAS

SECTION 2 OF 2

ALSO KNOWN AS, RICO (A); 00:WFO

THE MAJOR IT Y OF THE INFORMATION PROVIDED BY

HIS INFORMATION TO SPECIAL AGENT IN CHARGE NORTON, HAS

BEEN VERIFIED. THE SPECIFICS, HOWEVER, HAVE NOT BEEN DEVELOPED

TO DATE AND IT IS FELT THAT

HAS POSSESSION OF INFORMATION

THAT WOULD BE INVALUABLE TO CAPTIONED INVESTIGATION.

ON OCTOBER 27, 1980,

DEPARTMENTAL

ATTORNEY, 550 11TH STREET, N.W., WASHINGTON, D.C., WAS BRIEFED

REGARDING THE INTERVIEWS AND INFORMATION OBTAINED.





PAGE TWO DE WF 0034 UNCLAS REQUESTED THAT BASED UPON THE INTERVIEWS PREVIOUSLY COMPLETED AND THE INFORMATION AND POSSESSION OF BE INTERVIEWED CONCERNING THE IT IS IMPERATIVE THAT FIRE AND RELATED COVER INGS; AND HIS KNOWLEDGE OF THE GLENSIDE, INCORPORATION AND BRISTOL NURSING HOME INDIVIDUALS. WASHINGTON FIELD OFFICE DURING THE INTERVIEW OF EXPECT TO OBTAIN THE FOLLOWING INFORMATION: b7C 1. HIS KNOWLED GE OF THE ARSON AT COUNTRY SQUIRE INN, MIDDLETON. MASSACHUSETTS. 2. THE SUBSQUENT COVERUP OF THE INDIVIDUALS SUSPECTED OF ARSON OF COUNTRY SQUIRE INN. 3. WHY AT THE HEARING THE FIRE MARSHAL WAS NOT CALLED TO TESTIFY. 4. WHO WERE THE BENEFICIARIES OF THE JPR TRUST FUND. 5. WHO WAS THE OWNER OF THE COUNTRY SQUIRE INN,

6. WHO WERE THE INVESTIGATING OFFICERS, AND WHICH OF THE

INVESTIGATING OFFICERS WORKED FOR COUNTRY SQUIRE INN ON WEEKENDS.

HAVE ANY

7. DID



# PAGE THREE DE WF ØØ34 UNCLAS

| 8. WAS THE COUNTRY SQUIRE INN BURNED FOR PROFIT, IF SO FOR   |
|--|
| WHO,   |
| THE BUREAU SHOULD BE AWARE THAT HAS BEEN POSSIBLY            |
| INVOL VED IN   |
| BOTH OF THE BUSINESSES WHICH                                 |
| WAS ASSOCIATED WITH AND                                      |
|  |
| REQUEST THAT THE INTERVIEW OF b7C                            |
| BE CONDUCTED BY SPECIAL AGENTS (SA'S)                        |
| WASHINGTON FIELD OFFICE AND BOSTON DIVISION,                 |
| DUE TO THEIR VAST KNOWLED GE OF THE COUNTRY SQUIRE INN       |
| TRANSACTION AND RELATIONSHIPS OF THE INDIVIDUALS INVOLVED IN |
| THE ARSONS.  |
| THE BUREAU IS REQUESTED TO APPROVE THE TRAVEL OF SA'S        |
| AND TO LAS VEGAS DIVISION TO INTERVIEW                       |
| THE BUREAU IS ADVISED THAT CONTINGENT UPON BUREAU            |

PAGE FOUR DE WF 0034 UNCLAS

APPROVAL TENTATIVE ARRANGEMENTS HAVE ALREADY BEEN MADE TO INTERVIEW b7C

LAS VEGAS DIVISION IS ADVISED THAT CONTINGENT UPON BUREAU APPROVAL, TRAVEL ARRANGEMENTS WILL BE FORWARDED BY SEPARATE COMMUNICATION.

ALL OFFICES ARE ADVISED THAT THIS INFORMATION IS OF A HIGHLY SENSITIVE NATURE AND INDISCRIMINATE DISSEMINATION OF ANY PORTION OF THIS INFORMATION SHOULD BE AVOIDED. INFORMATION CONTAINED IN THIS COMMUNICATION IS ON A NEED TO KNOW BASIS ONLY.

BT

#0034

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-VZCZCHFC335

RR Q HQ BS

DE WF#0007 3042300

ZNR UUUUU

R 362229Z OCT BC

FM: SAC, WASHINGTON FIELD (183A-514) (P) (C-5)

TO: DIRECTOR, FBI (53-10334) @OUTINE)

SAC, BOSTON (183A-614) @OUTINE)

ET.

UNCLAS

SECTION 1 OF 2

ET AL, RICO, OO:WFO.

REFERENCE WASHINGTON FIELD TELEMPE'TO THE BUREAU, OCTOBER 24, 1982.

IN COMPLIANCE WITH BURLAU DIRECTIVES, THE FOLLOWING INFORMATION AND REFERENCED TELETYPE SUMMARIZES BOSTON AND WASHINGTON FILLD INVESTIGATION FOR OCTOBER, 1982, IN CAPTIONED MATTER.

VOL MINOUS RECORDS GAR NERLE EXOL SHALL EUSINESS

ADMINISTRATION (SBA) FILES, PUBLIC (MASSACHUSETTS) LAND

MECORDS, AND STATE NURSING HOME MATE COMMISSION FILINGS FOR

THE BRISTOL MURSING HOME (BRISTOL), FORMED THE BASIS OF THAS 1980

FOLLOWING MARRATIVE. DEPARTMENTAL ATTORNAYS

PUBLIC INTEGRITY SECTION, WERE FURNISHED

No

PAGE TWO DE WF 0807 U N'CL A S

A SIMILAR SYNOPSIS WHICH IN PART WILL BE INCLUDED WITHIN A JUDICIAL REQUEST FOR THE RELEASE OF VARIOUS INCOME TAX RETURNS OF INDIVIDUALS, CORPORATIONS AND PARTNERSHIPS INVOLVED IN THIS CASE. BUREAU SHOULD LOTE THAT ALL THE EXHIBITS REFERENCED IN THE SUMMARY ARE AVAILABLE THROUGH WASHINGTON FIELD.

C. NATHEW SON AND DR. VINCENT E. SLONIN, DBA BRISTOL MURSING HOME PARTNERSHIP (PARTNER SHIP) (EXHIBIT 5), PUR CHASED THE BRISTOL FACILITY FROM A LOCAL MASSACHUSETTE MURICIPALITY (EXHIBIT 1). IMMEDIATELY THE PARTNERSHIP INVESTED APPROXIMATELY \$142,000 TO REMOVATE/MODERNIZE THE PHYSICAL PLANT. FURING MAY, 1970, THE PARTRERSHIP OWNERSHIP CHANGED TO INCLUDE THE FOLLOWING INDIVIDUALS: SLOMIN; MATHEWSON, HURLEY, JOHN A. SHEA, C. R. OWENS, JUNEAR SHEAR; RICHARD TH. GANS, JAMES ROWAN, AND THOMAS P. O'NEILL, JR. (EXHIBIT 4). TERMS OF THE PARTMER SHIP PROVIDED THE FOLLOWING:

"DIVIDENDS SHALL BE PAID TO THE ASSOCIATES MEREIN AMOUNTS PROPORTIONATE TO THE STOCK OWNERSHIP INTO THE TRUST AND/OR CORPORATIONS EXCEPT THAT THE DIVIDENDS OCCURING HERE UNDER

| PAGE THREE DE WY EGST U N C L A S  | b7C                 |        |
|------------------------------------|---------------------|--------|
| TO THE AFORESAID O'REILL           | SHALL BE RETAINED   | BY THE |
| THUST AND/OR CORPORATIONS IN SUCH  | RETAINED DIVIDENDS  | SHALL  |
| BA TREATED AS A PORTION OF ANY CAP | PITAL ACCOUNT, IN T | HE     |
| STREET TOU OF THE THIRTHE OF THE   | MOTING TOUST "      |        |

APPLICATION WAS APPROVED FOR \$325,200 BY THE NORTHEAST FEDERAL SAVINGS AND LOAN OF WATCHOWN, MASSACHUSETTS (N.E.)
FOR THE PURPOSE OF COMPLETING FURTHER EXTENSIVE RENOVATIONS, WHICH HAD BALL APPROVED BY THE MASSACHUSETTS DEPARTMENTS OF PUBLIC HEALTH AND PUBLIC SAFETY (EXHIBIT S). THE MORTHEAST LOAN WAS DRAWN TO VINCENT E. SLOWIN, WALTER J. HURLLY AND STEVEN C. MATHEWSON AND RECORDED IN BRISTOL, Referral/Direct

ON OCTOBER 16, 1971, THE PARTNERSHIP, WHICH INCLUDES
THE SAME PLOPLE AS DESCRIBED IN THE MAY, 1970 AGREEMENT,
AMENDED THEIR CONTRACT TO INCLUDE THE FOLLOWING (EXHIBIT 15):

"THE SAID PARTNERS HAVE CONTRIBUTED CAPITAL IN EQUAL AMOUNTS WHICH CAPITAL WILL BE THE CAPITAL OF THE PARTNERSHIP. MLT PROCEEDS AND LOSSES ARE TO BE SHARED EQUALLY."

FINALLY, THE DEPARTMENT OF PUBLIC HEALTH, MASSACHUSETTS, ISSUED A LICANSE TO VINCENT E. SLOMIN, STEVEN C. MATHEWSON AND WALTER J. HURLEY TO OPERATE THE BRISTOL MURSING HOME LOCATUL IN ATTLEBORO, MASSACHUSETTS AS OF APRIL 19, 1972 (EXHIBIT 31). ON MAY 9, 1972, WALTER MURLEY COMPLETED A MURSING HOME RATE SETTING COMMISSION REPORT LISTING THE OWNERSHIP OF THE BRISTOL MURSING HOME AS FOLLOWS: SLOMIN, MATHEWSON, MURLEY, SHEA, OWNES, O'MMILL, JR., ROWAM, EUGENE SULLIVAN, JAMES KOHAL LES, AND WILLIAM LOUIS. MURLEY FILED A SIMILAR REPORT DATED APRIL 13, 1973, WHICH INCLUDED THE BHISTOL PARTMERSHIP AS FOLLOWS: SLOMIN, MATHEWSON, MURLEY,

| PAGE SIX DE WF 0007 U N C L A S                    |                 |
|--|-----------------|
| SHEA, OWENS, O'NEILL, JR., SULL IVAN, ROWAN, L AND | COMPANY,        |
| INCORPORATED CEXHIBITS 34, 36).                    | Referral/Direct |
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| TRANSMIT VIA:  Teletype Facsimile AIRTEL | PRECEDENCE:  Immediate  Priority  Routine  | CLASSIFICATION:  TOP SECRET  SECRET  CONFIDENTIAL  UNCLAS E F T O  UNCLAS  Date 11/3/80  | b7C          |
| FROM: KU                                 | DIRECTOR, FBI (58-103) SAC, BOSTON (183D-614) ET AL RICO   |  |              |
| Baltimore<br>to WFO, 9                   | Re WFO airtels dated teletype to Boston,   | 8/1, 8/6, 8/11 and 9/18/26/80, and Boston air the following:   | 2/80;<br>tel |
|  | oston Assessing Depard 560-568 Centre St.,   | 302's regarding review of the state of the s |              |
| Commonwea 10/2/80.                       | 3. Letter from the letter from | 50-6   | ated /- S    |
| the prope  2 Bureau                      |  | arding review of the Department records for Squire.  | Z NOV 5 1980 |
| (6) Approved:                            | Transmitted  | NO.  | er           |

(Number) (Time)

★ U.S. GOVERNMENT PRINTING OFFICE: 1980-305-750/5402

The following materials were hand delivered to WFO by SA  $\boxed{\phantom{A}}$  on 10/6/80:

1. Determination of Need application for the Glenside Hospital, dated 1/2/80, which includes four folders.

2. Records of which includes correspondence and survey drawings for the Glenside Hospital and the Centre Street Apartments.

3. Cost reports for the Glenside, Inc.,

from 3/1/69 to 8/31/79, obtained from
the Medicare Audit Division, Blue Cross-Blue Shield,
140 Federal Street, 8th floor, Boston, Mass., on 10/3/80.

- 4. Various records including cost reports, financial statements, etc., regarding the Bristol Nursing Home, Attleboro, Mass., obtained from Rate Setting Commission, One Ashburton Place, Boston, Mass.
- 5. Copies of the following deeds obtained from the Registry of Deeds, Suffolk County Courthouse, Boston, Mass.: 292029, 302728, 289115, 66182, 65460, 66288, 65459, 78385, Book 7415, page 541, Book 7463, page 207, Book 7455, page 197, Book 8074, page 282.
- 6. Copies of real estate deeds for Thomas P. O'Neil, Jr.,
- 7. Copies of SMH bar review notes for the state of Massachusetts, Volume 1, for trusts relating to real property.
- 8. Copy of the Articles of Organization for the Chestnut Hill Nursing Home, Inc.

- 9. Copies of Articles of Organization for the following companies:
  - 1. Olympus Research Corp.
  - 2. Congress Capitol Corp.
  - 3. Continental Shelter Corp.
  - 4. Continental Wingate Associates, Inc.
  - 5. The Barclay House, Inc.
  - 6. Jamaicaway Development Co., Inc.
  - 7. Beacon Construction Co., Inc.
  - 8. Jamaicaway Tower and Cooperative House Corp.

| o. Jamarcaway rower and cooperactive mouse corp.  |
|---|
| 10. Copies of Boston FBI files regarding  |
|   |
| 11. Copies of records regarding the Bristol b7  |
| Nursing Home, Attleboro, Mass., obtained from  Bureau of Health Standards and Quality,                  |
| Room 1301, John F. Kennedy Building, Boston, Mass., telephone   |
| 12. Photographs of the Glenside Hospital and Centre Street Apartments which include aerial photographs. |
| 13. Copies of deeds for the Bristol Nursing Home dated $12/9/68$ .                                      |
| 14. Copies of various communications including  |
| informant information regarding and others.   |
| 15. U. S. Attorney's, Boston, Mass. records regarding conviction of                                     |
| obtained from AUSA Alan D. Rose, Boston, Mass.  |

- Home obtained from Massachusetts Department of Public Welfare, Intralevel Care 3, 80 Boylston St., Boston, Mass.
- 11. Detailed street map of the area adjacent to the Glenside Hospital and Centre Street Apartments, Jamaica Plain, Mass., which was obtained from City Hall, Boston, Mass.

BS 183D-614

| Review of the records at the Registry of Deeds.  |
|--|
| Suffolk County Courthouse, Boston, Mass., for  |
| dated 9/10/68, Book 8231, page 823, determined that  |
| no such record exists. Book 8231 has a total of 750 pages  |
| and review of that book disclosed nothing regarding  |
| and review of that book discrosed nothing regarding  |
| $n_{ij} \cdot n_{ij} \cdot n_{ij}$   |
| b7C  |
| Review of the Articles of Organization, Secretary  |
| of State, Boston, Mass., determined that there is no record  |
| of the Turner Associates Trust, Jamaicaway Development, or   |
| the Jamaicaway Terrace Apartments, Inc.  |
|  |
| On 9/17/80, a search of the records of the Secretary   |
| of State's Office, Taxation and Corporation Department,  |
|  |
| John W. McCormack Building, Boston, Mass., disclosed no  |
|  |
| record whatsoever for  |
| or any information   |
|  |
| or any information   |
| or any information similar to that name.   |
| or any information similar to that name.  Review of the Boston Division of the FBI's indices   |
| or any information similar to that name.  Review of the Boston Division of the FBI's indices records failed to disclose any record for   |
| Review of the Boston Division of the FBI's indices records failed to disclose any record for Indices disclosed four entries for  |
| or any information similar to that name.  Review of the Boston Division of the FBI's indices records failed to disclose any record for   |
| Review of the Boston Division of the FBI's indices records failed to disclose any record for Indices disclosed four entries for however, files for this individual have been destroyed.                                      |
| Review of the Boston Division of the FBI's indices records failed to disclose any record for Indices disclosed four entries for however, files for this individual have been destroyed.  Boston file 58-374 entitled         |
| Review of the Boston Division of the FBI's indices records failed to disclose any record for Indices disclosed four entries for however, files for this individual have been destroyed.  Boston file 58-374 entitled Federal |
| Review of the Boston Division of the FBI's indices records failed to disclose any record for Indices disclosed four entries for however, files for this individual have been destroyed.  Boston file 58-374 entitled         |

| TRANSMIT VIA:  | PRECEDENCE:   |   | 1  |
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| Ţ Facsimile '  | Immediate   Priority   Routine  | - CLASSIFICATION:  TOP SECRET  SECRET  CONFIDENTIAL  UNCLAS E F T O  UNCLAS  Date   |  |
| TO: DIR  | ECTOR, FBI (58-10   | 334)  |  |
| FROM: SAC  | , NEW ORLEANS (18   | 3A-464) - P - b   | 7C   |
| RICO<br>OO: WFO  | ,   | 141   | -  |
| De   | WFO airtel to the   | Director, 10/17/80.   |  |
| Enc  | losed for WFO is  | one copy each of the fold   | lowing:  |
| 1.   |   | "Rules of the State Boa" Accountants of Louisian  | 1  |
| 2.   | Booklet entitled<br>of Public Accoun  | "Statutes Governing Practing."  | ctice  |
| 3.   | Certification fi<br>the State Board   | led by of CPA's of Louisiana  | with U   |
| 4.   | Copy of letterhe  |   | iled _   |
| State Board o 310, 333 St. furnished the only other do initial applicates results. | Charles Avenue, R<br>above described<br>cuments on file w<br>cation to sit for<br>This applicatio | c Accountants of Louisian  ew Orleans, Louisiana,  documents.  ith her office would be the CPA exam and the res n would also set forth be ication such as | ed the<br>an individua<br>sultant<br>ackground |
| 2 - Bureau<br>2 - WFO (Enc.<br>2 - New Orlean<br>FIC:dsg                           | 4) 1-CC-WCC Folder  | NOV 7   | 1980   |
| 66NO   | 26<br>V 1 8 1980  |   |  |

HO 183A-464 FNC:dsg

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| and educationa | 1 experience qualifying the applicant to set   |
|----------------|--|
| for the exam.  |  |
| and cannot be  | released without a subpoena directed to her.   |
|                | 1/3/80, the following individuals and corporati<br>in the "Brilab" computer with negative results. |

DeBlois-Chandler, Inc., Quali-Care, Inc., Quali-Care of La., Health Services, Inc., DeBlois, Inc., Humana, Inc., Glenside, Inc., Human Services, Inc., American Health Services, Inc., Thomas P. O'Neil. Jr.,

LEADS:

#### WFO DIVISION

AT WASHINGTON, D.C. Obtain subpoena for records of the State Board of Certified Public Accountants if additional information is desired regarding CPA's, New Orleans, Louisiana.

#### NEW ORLEANS DIVISION

AT MEW OPLEANS, LOUISIANA. Investigation continuing.

| V (5)      | VZ 6Z CW F0 603   | The State of State of    |
|------------|---|--------------------------|
| No.        | [발발][[발발] [[발] [[발] [[발] [[발] [[발] [[발]                 | FOR. 40.13.15            |
|            | DE WF #8018 2982316 / RECEIVED                          | Asso, ph.<br>Admir Sayes |
|            | 725 WHITE   | A same                   |
| er ave     | ZNR UUUUU<br>P 242232Z OCT 80                           |                          |
| - × -      | FIDERAL AND   |                          |
|            | FM WASHINGTON FIELD (183A-514) (BOMMUNICATIONS SECTION  | Marker J.                |
|            | TO DIRECTOR, FBI (53-12334) PRIORITY                    | 2 M. Cone                |
| 11         |   | OM                       |
|            | PUBLIC AFFAIR OFFICE                                    | 200                      |
|            | FBI BOST ON (1837-614) PR IOR ITY b2                    |                          |
|            | BT b7C  |                          |
| (1)<br>(1) | UNCLAS b7D  | Ed 19                    |
|            | AKA; ET AL; RICO; OO:WASHINGTON FIELD                   | 11/1/                    |
| ,          | RE WFO TELEPHONE CALLS TO FBIHO AND BOSTON, OCTOBER 23, |                          |
|            | 1986.   |                          |
|            | FOR INFORMATION OF BUREAU ON OCTOBER 23, 1980,          |                          |
|            | CONTACTED SPECIAL AGENT (SA)  AND ADVISE                | o Table                  |
| <b>N</b>   | THAT  |                          |
|            |   |                          |
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|            |   | <b>4</b> 1980            |
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|            |   | WA)                      |
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|            |   | S. L.                    |

HAS NO SPECIFIC KNOWLEDGE AS TO THE DEVELOPMENT OF CAPTIONED MATTER BY WASHINGTON FIELD. CONVERSATIONS BETWEEN WASHINGTON FIELD AND SOURCE HAS BEEN CONFINED TO ONLY RECEIVING

PAGE FOUR DE WF 0218 UNCLAS INFORMATION AND UPDATING INFORMATION PREVIOUSLY PROVIDED BY SOURCE WITHOUT DISCUSSING IN DETAIL CAPTIONED MATTER.

WASHINGTON FIELD, BASED UPON CONVERSATION WITH SOURCE, CONCLUDES THAT NO INFORMATION RELATING TO CAPTIONED MATTER HAS BEEN DIVULGED TO THE PRESS, NOR AT THIS TIME WILL ANY INFORMATION

BE PROVIDED TO THEM BY

ŊΖ

THIS INFORMATION IS BEING PROVIDED TO FRIHQ IN THE EVENT

ANY PRESS INQUIRIES SHOULD BE MADE REGARDING THIS MATTER.

WASHINGTON FIELD IS MAINTAINING A "NO COMMENT" STATUS.

BT

#6018 NNNN VACZOWF0114

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DE WF #2024 3120055

7 Nov 80 01 57 z

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FM FBI WASHINGTON FIELD (183A-514) (P) (SQ-C-5)

TO DIRECTOR FBI (58-12334) PRIORITY)

FBI BOSTON (183A-514) PR IOR ITY

FBI MIAMI PRIORITY

BT

,b70

UNCLAS

AKA; ET AL, FICO (A), (OO:WASMINGTON FIELD)

REMIAMI TELETYPE TO WFO DATED NOVEMBER 4. 1980.

WFO TELETYPE TO MIAMI DATED NOVEMBER 4, 1980.

MIAMI DIVISION IS ADVISED THAT THE BUREAU REQUEST COPIES OF ALL COMMUNICATIONS BETWEEN DIVISION IN THIS MATTER.

ALL OFFICES ARE ADVISED THAT THIS INFORMATION IS OF A
HIGHLY SENSITIVE NATURE AND INDISCRIMINATE DISSEMINATION
OF ANY PORTION OF THIS INFORMATION SHOULD BE AVOIDED.
INFORMATION CONTAINED IN THIS COMMUNICATION IS ON A NEED TO
KNOW BASIS ONLY.
7 NOV 10 1960

ON OCTOBER 30, 1980, WASHINGTON FIELD AND BOSTON AGENTS

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All Market

59 NOT 17 1980

| PAGE TWO DE WF @ | 024 UNCLAS                 |                                       |
|------------------|----------------------------|---------------------------------------|
| INTERVIEW ED     |                            | ,                                     |
| AT               | LAS VEGAS, NEVADA. DUR INC | G THIS COMPREHENSIVE                  |
| INTERVIEW OF     | NUMER OUS INFORMATION      | WAS OBTAIN RELATING                   |
| TO CAPTION MATTE | R. DIR ING THIS IN         | TERVIEW STATED THAT                   |
|                  | WHITE MALE, MASSACHUSET    | TS RESIDENT, WAS                      |
|                  |                            |                                       |
|                  |                            |                                       |
|                  |                            |                                       |
| -WASHINGT ON     | FIELD ALSO LEARNED FROM A  | SOURCE THAT                           |
| WHITE MALE       | , FLOR IDA RESIDENT,       |                                       |
| •                |                            | <b>I</b>                              |
|                  | WASHINGTON FI              | ELE HAS NO DATE                       |
| OF BIRTH ON EITH | ER IND IVIDUALS.           | · · · · · · · · · · · · · · · · · · · |
| MIAMI SHOUL      | D BE ADVISED THAT          | IS                                    |
|                  |                            |                                       |
|                  | IS UNDER INVESTIGATION IN  | CAPTIONED MATTER.                     |
|                  | <u> </u>                   |                                       |
|                  |                            | WASHING TON                           |
|                  |                            |                                       |

FIELD NOTES THAT THESE REVELATIONS THOUGH NOT NECESSARILY

PAGE THREE DE WF 0024 UNCLAS

CONNECTED WITH CAPTIONED MATTER, ARE IMPORTANT IN THAT

THERE HAVE BEEN SOME ALLEGATIONS THAT O'NEILL'S AND HIS

ASSOCIATES ARE INVOLVED IN DRUG DEALINGS.

| 0 0 00     | VENBER 5,  | 193g Da  | PART MENTA | L ATTO | Y BW SC |            |   |
|------------|------------|----------|------------|--------|---------|------------|---|
|            | W ASHINGTO | v, D. C. | . REQUEST  | THAT   | THESE   | ALLEGATION | S |
| BL ASCERTA | INED AS TO | THEIR    | VALIDITY.  |        |         | •          |   |

MIAMI DIVISION IS REQUESTED TO CONTACT DEA AND U.S.
CUSTOMS, MIAMI, FLOR DEA AND DETERMINE IF THEIR RECORDS
REFLECT ANY INFORMATION REGARDING THE ALLEGATIONS. IF
ALLEGATIONS ARE CONFIRMED, WASHINGTON FIELD SHOULD IMMEDIATELY
BY TELETYPE BE ADVISED OF THE FACTS OF THEIR INVESTIGATION.
BT

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RECEIVED TELETYPE UNIT

4 Nov 80 00 33z

FEDERAL RUNEAU OF INVESTIGATION COMMUNICATIONS SECTION

LAWS.

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PP HQ BS JK WF

DE MM

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FM MIAMI (183A-1078) P

TO DIRECTOR (58-10334) PRIORITY

BOSTON (183A-614) PRIORITY

JACKSONVILLE PRIORITY

WASHINGTON FIELD (183A-514) (SQ. C-5) PRIORITY

BT

UNCLAS E F T O

AKA; ET AL, RICO (A), OO: WASHINGTON FIELD.

RE MIAMI TELEPHONE CALLS TO WASHINGTON FIELD ON OCTOBER 31, AND NOVEMBER 3, 1980.

INQUIRY MADE AT FLORIDA RACING COMMISSION, MIAMI, FLORIDA,
REVEALED PALM BEACH, FLORIDA, LISTED
IN 1979, HOWEVER, 1980

LICENSE NOT RENEWED.

AND PREVIOUSLY DESCRIBED TO WASHINGTON FIELD OFFICE BY PREVIOUS

OMMUNICATION. ON OCTOBER 31, 1980,

U. S. SMALL BUSINESS ADMINISTRATION, (SBA), FEDERAL BUILDING,

b7C

29

| PAGE TWO MM 183A-1078 UNCLAS E F T O              | b7C    |
|---|--------|
| WEST PALM BEACH, FLORIDA, CONFIDENTIALLY ADVISED  | b7D    |
| •   |        |
|   |        |
|   |        |
|   |        |
|   |        |
| ADVISED ANY SBA POSITION OVER GRADE 7 OR 9        |        |
| ADVERTISED NATIONALLY AND WHEN VACANCY FOR        |        |
| MIAMI, FLORIDA, HOWEVER                           | <br>?, |
| WAS SELECTED. IN INTERIM PERIOD,                  |        |
|   |        |
|   |        |
|   | i.     |
|   |        |
| LATER, A SMALL BUSINESS ADMINISTRATION OFFICE WAS |        |
| OPENED IN WEST PALM BEACH, FLORIDA,               | •      |
| WHEN FOR THIS POSITION                            |        |
| AND WAS APPOINTED APPROXIMATELY                   | ٦      |
| THEN  |        |

| PAGE FOUR MM 183A-1078 UNCLAS E F T O  |     |
|--|-----|
| STATED ON THE OTHER HAND,  | 7   |
| •  |     |
|  | b7C |
|  | b7D |
|  |     |
| BE CONTACTED FOR SPECIFIC ADDRESS.  WAS EXTREMELY CURIOUS AS TO THE CURRENT FBI INQUIR | Υ   |
| AND ON HIS OWN SUGGESTED THAT THIS INVESTIGATION MAY PERTAIN TO                        |     |
| A MATTER PREVIOUSLY INVESTIGATED BY INTERNAL SECURITY OF SBA                           | * * |
| REGARDING POLITICAL INFLUENCE OF   |     |
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| <u></u>  |     |

| PAGE FIVE MM 183A-1078 UNCLAS E F   | TO                             |
|-------------------------------------|--------------------------------|
|                                     |                                |
|                                     |                                |
| NAME                                | HAD COME UP AGAIN IN THE       |
| TIP O'NEAL INVESTIGATION.           |                                |
| ON NOVEMBER 3, 1980,                | CONTACTED AT HIS OFFICE        |
|                                     | AND ADVISED THAT               |
| HE WOULD BE AVAILABLE THIS WEEK FO  | R FBI INTERVIEW. HE WAS        |
| EXTREMELY CURIOUS AS TO THE NATURE  | of the interview, However, b70 |
| THE INTERVIEWING AGENT FURNISHED A  |                                |
| REGARDING THIS MATTER.              |                                |
| ATTEMPTS TO LOCATE                  | AT HIS CONDOMINIUM             |
|                                     | ON NOVEMBER                    |
| 3, 1980, HAVE MET WITH NEGATIVE RE  | SULTS AND INTERVIEWS WITH      |
| CONDOMINIUM MANAGER AND NEIGHBORS   | REVEALED IS CURRENTLY          |
| OUT OF TOWN IN                      | HOWEVER, NO                    |
| FORWARDING ADDRESS WAS AVAILABLE.   | IS SCHEDULED TO RETURN         |
| TO MIAMI, FLORIDA, EITHER THE EVEN  | ING OF NOVEMBER 3, OR ON       |
| NOVEMBER 4, 1980, AND MES SAGES HAV | E BEEN LEFT TO CONTACT SA      |
| MIAMI DIVISION, IN                  | ORDER THAT INTERVIEW CAN BE    |

PAGE SIX MM 183-1078 UNCLAS E F TO FACILITATED.

| INVE STIGATION CONTINUING MIAMI DIVISION AND WASH    | INGTON |
|--|--------|
| FIELD DIVISION WILL BE ADVISED AS TO AVAILABILITY OF | b7C    |
|  |        |
| DT .   | 7      |

# Memorandum



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| Exec AD LES        |
| Asst. Dir.:        |
| Adm. Servs         |
| Crim. Inv          |
| Ident.             |
| Intell.            |
| Laboratory         |
| Legal Coun         |
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| Rec. Mgnt          |
| Tech. Servs        |
| Training           |
| Public Affs. Off   |
| Telephone Rm       |
| Director's Sec'y _ |
| ·                  |

b7C

To:

Date 10/17/80

From:

J. E. Henehan

1 - Mr. Caro

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PURPOSE: (1) To secure a code name for captioned matter; (2) to recommend that files pertaining to this matter be placed in the Special File Room at FBIHQ; and (3) to report results of FBIHQ conference 10/6/80 regarding captioned matter.

SYNOPSIS: On 10/6/80, a conference was held at FBIHQ to discuss the investigative approaches to this matter, and to give administrative guidance to those responsible for coordinating and conducting the investigation. Departmental Attorney discussed the factual predicate for this matter and the applicability of the bar of the Statute of Limitations. Mr. Caro addressed the priority of this matter and the sensitive nature of the inquiry. He also directed that a code name be established and that this matter be placed in Special File.

An investigative approach was agreed upon by those present. Representatives of those offices primarily responsible for the investigation were present for this meeting and have pledged that appropriate resources would be committed to this matter to insure its priority handling and special security. The code name "PHOENIX BIRD" was suggested by WFO Office of Origin, in this matter.

RECOMMENDATIONS: (1) That the code name "PHOENIX BIRD" be adopted for this investigative operation.

| APPROVED:                  | Adm. Serv.                      | Legal Coun.  |
|----------------------------|---------------------------------|--|
| Director                   | Crim, Inv. NBV                  | Plan. & Insp<br>Rac. Mgnt.                         |
| Exec. AD-Inv. Exec. AD-LES | Ident.<br>intell.<br>Laboratory | Tech. Servs. Training Off. of Cong. & Public Affs. |

WLL: cam (5)

CONTINUED - OVER

□ NOV 4 1980

ROUTE IN ENVELOPE

84 DEC 101880

FBI/DO

| (2) That files pertaining to this matter be placed in the Special File Room at FBIHQ.  APPROVED:  Adm. Serv.  Crim. Abw. Approved.  Adm. Serv.  Crim. Abw. Approved.  Rear. A larsp.  Flac. A larsp.  Flac. A larsp.  Flac. A larsp.  Flac. A larsp.  Flac. A larsp.  Flac. A larsp.  Flac. A serve.  Training  Toch. Serve.  Training  Abblic Adds.  DETAILS: Investigation in this matter was instituted upon allegations that close associates and staff members of Speaker O'Neill were aiding him in business ventures by concealing his ownership interests in several health care facilities, and at the same time, utilizing his influence in securing Government finances for these ventures.  Department of Housing and Urban Development (HUD), Securities Exchange Commission (SEC), and Small Business Administration (SBA) records show a complicated pattern of interlocking corporate financial transactions, which may be constructed to conflict with information contained in applications for Government loans filed with SBA and HUD.  The U. S. Attorney (USA), Washington, D. C., has advised in preliminary opinion that these allegations, if proven, would support violations of the Federal Bribery and Conflict of Interest statutes. |  |  |  |  |
|---|--|--|--|--|
| DETAILS: Investigation in this matter was instituted upon allegations that close associates and staff members of Speaker O'Neill were aiding him in business ventures by concealing his ownership interests in several health care facilities, and at the same time, utilizing his influence in securing Government finances for these ventures.  Department of Housing and Urban Development (HUD), Securities Exchange Commission (SEC), and Small Business Administration (SBA) records show a complicated pattern of interlocking corporate financial transactions, which may be constructed to conflict with information contained in applications for Government loans filed with SBA and HUD.  The U. S. Attorney (USA), Washington, D. C., has advised in preliminary opinion that these allegations, if proven, would support violations of the Federal Bribery and Conflict of Interest statutes.   |  |  |  |  |
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| Exchange Commission (SEC), and Small Business Administration (SBA) records show a complicated pattern of interlocking corporate financial transactions, which may be constructed to conflict with information contained in applications for Government loans filed with SBA and HUD.  The U. S. Attorney (USA), Washington, D. C., has advised in preliminary opinion that these allegations, if proven, would support violations of the Federal Bribery and Conflict of Interest statutes.   |  |  |  |  |
| in preliminary opinion that these allegations, if proven, would support violations of the Federal Bribery and Conflict of Interest statutes.  |  |  |  |  |
| The sate which predicated this investigation economic   |  |  |  |  |
| The acts, which predicated this investigation. occurred during the period 1970-73. Therefore, was assigned by the Department of Justice (DOJ) to study the factual predicate for this matter, and the applicability of the bar of the Statute of Limitations, Title 18, U. S. Code 3282. has prepared a memorandum which deals with these issues and submitted it to Assistant Attorney General Philip B. Heymann for approval. has advised that in the interim period, the investigation should continue.  |  |  |  |  |
| On 10/6/80, a conference was held at FBIHQ to discuss the investigative appoaches to this matter and to give administrative guidance to those responsible for coordinating and conducting the investigation. Attendees were:  |  |  |  |  |
| Department of Justice   |  |  |  |  |
| Attorney  |  |  |  |  |

Henehan to Memorandum RE: FBIHQ Dana E. Caro, Inspector-Deputy Assistant Director Joseph E. Henehan, Section Chief Thomas F. Jones, Assistant Section Chief Unit Chief Supervisor Supervisor <u>Secretary</u> WFO Thomas J. Baker, ASAC Supervisor SA SA b7C BOSTON Lawrence Sarhatt, SAC SA SA

Mr. Caro gave directions to those present concerning the importance and priority of this inquiry and expressed the full support of FBIHQ to bring this matter to a logical conclusion. He also stressed the need to properly safeguard the security and integrity of the investigation, in view of the sensitive positions held by those identified as possible subjects in this matter. He directed that a code name be established for this investigative operation, and that files pertaining to this matter be placed in the Special File Room at FBIHQ. He also directed that files pertaining to this matter located in field offices conducting investigation in this matter be given special handling and limited access.

The code name "PHOENIX BIRD" was recommended by WFO, who is primarily responsible for the investigation of this matter. A check of the indices for the code name "PHOENIX BIRD" proved negative for any prior references.

Departmental Attorney presented the background of this investigation and discussed his recent memorandum concerning the factual predicate and the applicability of the bar of Statute of Limitations. also discussed the need for Departmental approval prior to the initiation of any Grand Jury inquiry in this matter, and suggested that overt investigation prior to initiation

| Hene <u>han</u> to  | Memorandum  | b7C   |
|---|---|---|
| RE:   |   |   |
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| anticipates Depart  | tmental approval<br>tated that in the   | blic source information. for this investigation will be meantime, discreet investigation  |
| loans connected witransactions as timatter; Glennside matter. | business transactith these transactith these transaction makes and the suggested that the grand Jury action | atter; the Bristol Nursing Home<br>tter; and the Centre Street Apartments<br>he most logical approach to this<br>, would be to concentrate investi- |
|   |   | as his activities pertain to  |
|   |   | ehenge." Those present during   |
| the conference ag:  | reed with this ap   | proach to this matter.  |

Mr. Caro expressed the FBI's complete support concerning the need for a Grand Jury inquiry in this matter, and stated that this support would be conveyed to appropriate DOJ officials.

SAC Sarhatt, BS Division, and ASAC Baker, WFO, both expressed complete support for this investigation and advised that appropriate resources would be committed to this matter to insure its priority handling until it reaches a logical conclusion.

#### Airtel

11/21/80

Director, FBI (58-10334)

SACs, WFO (183-514)
Boston (183-614)

PHOENIX BIRD RICO (D) OO: WFO b7C

ReWFOtel to the Bureau, 11/18/80.

The code name "PHOENIX BIRD" has been approved for use in this investigation, which has been placed in the Special File Room, FBIHQ. All future communications should be captioned with the code name.

For the information of WFO, Visual Investigative Analysis Unit, FBIHQ, advised that this matter is being given priority attention and charts will be completed in the near future.

It is anticipated that a meeting will be held within the next week to ten days concerning the possible grand jury action in this matter. Subsequent to that meeting, action will be taken on the computerization of this matter and the designation of a major case indicator.

WLL:jaw (4)

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Exec AD Inv.

Exec AD Adm.

Exec AD LES

Asst. Dir.:

Adm. Servs.

Crim. Inv.

Ident.

Intell.

Laboratory

Legal Coun.

Plan. & Insp.

Rec. Mgnt.

Training

Public Affs. Off.

Telephone Rm.

Director's Sec'y \_

MAIL ROOM & MAIL

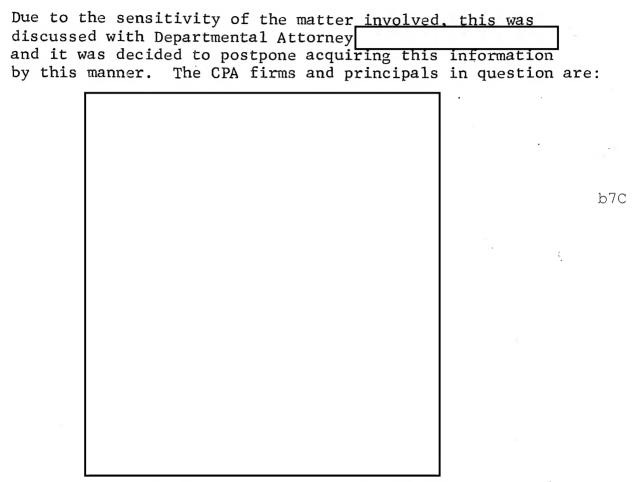
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| TO:           | DIRECTOR, FBI (58-10                                      | 334)  |  |
| FROM:         | SAC, BOSTON (183D-61                                      | 4)(SUB S) (P)   |  |
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|               | Re WFO airtel to Bur                                      | eau dated 10/17/80.   | (Ks)   |
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|               | <ol> <li>Interview on 10/<br/>Mass. State Poli</li> </ol> |   |  |
|               | 2. Interview of Mass. State Poli                          | ce, Fire Marshal's Office.  |  |
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|               | 3. Interview of   |   | Magaz S  |
|               | Mass. Board of P  | Public Accountancy, Boston,   | Mass.  |
| only be a     | cense applications) for acquired by the writing           | partnership disclosure state<br>or the following CPA firms<br>ong of a letter signed by the | can<br>e   |
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Approved Transmitted (Number) (Time)

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BS 183D-614



The Articles of Incorporation for the Robinwood Trust, Jamaica Plain, Mass., are not on file with the Department of Corporations, Commonwealth of Mass. A search of these records was done and it was determined that either the Robinwood Trust never filed with the Commonwealth of Mass. or that the shares in the trust were classified as nontransferable shares and thus the trust was exempt from filing.

A check of Boston indices resulted in obtaining negative information concerning Boston, Mass. and Boston, Mass. More background information is required for both individuals in order to obtain credit and criminal checks.

BS 183D-614

### LEADS:

### BOSTON DIVISION

## AT BOSTON, MASS.

- 1. Will, through appropriate officials at the State Board of Accountancy, Boston, obtain copies of the personal and partnership disclosure statements (i.e. license applications) for the previously mentioned CPA firms.
- 2. Will, through appropriate officials at the City of Boston, Building License Department, Boston, obtain copies of the building license permits, inspection permits, and building violations for the below listed buildings from 1968 through 1972.

Centre Street Apartments 560-568 Centre Street Jamaica Plain, Mass.

Glenside Hospital 49 Rpbinwood Avenue Jamaica Plain, Mass.

3. Will, through appropriate officials, Recorder of Deeds, Suffolk County, Mass., obtain copies of all properties purchased or sold by the Robinwood Trust from 1977 through present.

# AT ATTLEBORO, MASS.

Will, through appropriate officials at the City of Attleboro, Building License Department, Attleboro, Mass., obtain copies of the building license permits, inspection permits, and building violations for the below listed building from 1968 through 1972:

Bristol Nursing Home 1000 Oak Hill Avenue Attleboro, Mass.

Transmitted \_

(Time)

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| TRANSMIT VIA:  Teletype Facsimile AIRTEL            | PRECEDENCE:  Immediate  Priority  Routine                                       | CLASSIFICATION:  TOP SECRET  SECRET  CONFIDENTIAL  UNCLAS E F T O  UNCLAS  Date 11/26/80                                       |                  |
| TO:   | DIRECTOR, FBI (58-103)  | 34)  | b7C              |
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| FROM: SUBJECT:                                      | SAC, BOSTON (183D-614) PHOENIX BIRD RICO (00: WFO)                              | ) (P)  |                  |
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